

*May 2, 2024 in re Delgado v Trump for President -
Deposition of Kellyanne Conway*

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
CASE NO. 19-CV-11764 (AT) (KHP)

ARLENE DELGADO,

Plaintiff,

vs.

DONALD J. TRUMP FOR PRESIDENT,
ET AL.,

Defendants.

LOCATION: Remote Audio-Video
Communication

DATE: May 2, 2024

TIME: 10:00 AM ET to 1:05 PM ET

DEPOSITION OF KELLYANNE CONWAY

Taken before Leila Harris, LCR, FPR,
Stenographic Court Reporter, Notary Public State of
Florida, pursuant to Notice of Taking Deposition in
the above-styled cause.

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P R O C E E D I N G S

THE STENOGRAPHER: Pursuant to stipulation, the oath administered by me here today will have the same force and effect as if it were being given to the witness while they were physically present before me in the State of Florida and I were acting in my capacity as a Florida Notary.

KELLYANNE CONWAY

was called as a witness, and after having been first remotely duly sworn was deposed and testified as follows:

THE WITNESS: I do.

THE STENOGRAPHER: Thank you. You can put your hand down.

EXAMINATION

BY MS. DELGADO:

Q Good morning, Ms. Conway.

A Good morning. How are you, Ms. Delgado?

Q Good, good.

Is it okay if I refer to you as Kellyanne?

A Please do.

Q Okay. Great to see you.

I have a few ground rules, but -- I

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1 know you've been deposed before, but I just have to
2 go over these for the record.

3 If you need to take a break for any
4 reason -- bathroom, drinks, and water -- just let me
5 know, and we'll take a break. Just don't speak to
6 your counsel, obviously, about your testimony. If
7 you don't understand a question I asked, let me
8 know. I'll reask it or, perhaps, even rephrase it.
9 If -- let's see.

10 I think that might be it for ground
11 rules.

12 I -- yeah. I think that -- if
13 anybody else has any others, I think we can go ahead
14 and get part started with Attachment A.

15 There was an Attachment A on your
16 subpoena with the heading Attachment A. Did you
17 receive that?

18 **A I did.**

19 Q Okay. Do you have any documents to
20 produce?

21 **A I do not.**

22 Q Okay. So on every category for
23 Attachment A, the answer is that you have no
24 documents for any of those, correct?

25 **A No. The only -- that's correct. And if**

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1 you want me to explain why, I'm happy to.

2 I used, at the Trump campaign, which
3 was a client of my firm -- I wasn't an employee -- I
4 continued to use my polling company. I was using my
5 company's e-mail address at all times,
6 kellyanne@pollingcompany.com.

7 I sold that company in Nov- --
8 October, November of 2017. The acquiring firm
9 destroyed all of those e-mails for myself and all my
10 employees and contractors. So I don't have access
11 to any of those. My donaldtrump.com e-mails, I
12 never -- I never used that e-mail address anyway,
13 but I'm -- you'd have to ask the campaign about how
14 they keep their -- store their old e-mails.

15 The only thing I can think that I
16 have that would be relevant to what you -- what you
17 requested is a handwritten personal note that you
18 gave me in the fall of 2016 after the campaign. It
19 was lovely. It was very warm. It was very
20 friendly. It was very congratulatory.

21 I know that that exists. I just
22 don't know where I would find it. I moved my family
23 to Washington, D.C. It could be in storage in New
24 Jersey.

25 Q Okay. So no documents, then, to produce.

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1 And congratulations on the sale of
2 your firm. That was --

3 **A Sorry?**

4 Q Congratulations on the sale of the firm.

5 **A Oh, thank you. Thank you, yes. I**
6 **appreciate that. Thank you.**

7 Q Okay. So in preparation for this
8 deposition, what documents did you review, if any?

9 **A I reviewed the subpoena, and I reviewed**
10 **the complaint. I would have reviewed whatever**
11 **complaint that my -- that counsel, Mr. Flood,**
12 **provided me, which I assume is the most up-to-date**
13 **complaint or amended complaint. That's it.**

14 Q Okay. So plaintiff's complaint. Anything
15 else?

16 **A No.**

17 Q No. Okay.

18 And is the Trump campaign -- has the
19 Trump campaign provided you -- your attorney here
20 today, be it connecting you with this attorney or
21 paying for his service here today?

22 **A No.**

23 Q Okay. You personally retained Mr. Flood?

24 **A Yes.**

25 Q Okay. And I should have mentioned this.

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1 This was what -- this is the other thing I meant to
2 mention at the ground rules.

3 When I ask you questions, you'll see
4 they're probably not in chronological order, even in
5 subject matter order. It's not a tactic or a trick.
6 It's just my notes are not in order.

7 **A It's fine.**

8 Q It's just something that occurred --
9 usually -- for most of the depositions I've taken;
10 but particularly, in this one, my notes are a little
11 bit out of order. So if you see me jump in
12 timeline, et cetera, it's not a tactic or a trick.
13 It's just the way my notes are written.

14 Okay. So let's talk about, you
15 were -- well, first, if you could tell me, what's
16 your current occupation, Kellyanne?

17 **A I am president and founder of Principal of**
18 **KA Consulting LLC. That's a company that I started**
19 **probably three years ago, and that's my day-to-day**
20 **job. But also, I'm a Fox News contributor. Not an**
21 **employee, again. A contributor.**

22 Q Right. So an independent contractor for
23 Fox News.

24 **A Correct. Correct.**

25 Q And is any entity related to Donald Trump

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1 one of your current clients?

2 **A No.**

3 Q Do you remain a supporter of Mr. Trump?

4 **A Yes.**

5 Q And do you support his candidacy for 2024?

6 **A I do.**

7 Q Okay. Let's talk about 2016.

8 You were the campaign manager,

9 correct?

10 **A That's right. Starting in August 12th,**
11 **2016.**

12 Q Starting August 2016. Great.

13 Do you recall, Kellyanne, what
14 complaints were raised? And when I use the word
15 "complaints," I don't mean formal complaints. Just
16 any sort of complaining or raising a concern
17 regarding gender mistreatment; discrimination;
18 harassment, including sexual harassment; or
19 pregnancy issues? I assume probably the pregnancy
20 might have just been mine.

21 But any gender-related or sexual
22 harassment-related concerns or complaints that were
23 raised to anyone? Whether to you or HR that you
24 heard of?

25 MR. BLUMETTI: Objection to form.

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1 BY MS. DELGADO:

2 Q I can rephrase. I'm just -- I'm trying to
3 speed things up to --

4 (Simultaneous speakers.)

5 A No, no. Go ahead. I just want to make
6 sure that I -- that --

7 Q I'll rephrase it --

8 A Go ahead.

9 Q I'll rephrase so that it's not objected
10 to.

11 During your time as campaign manager
12 or prior to your time as campaign manager -- so
13 any -- let me rephrase that again.

14 For the period of -- regarding the
15 period 2015 to 2016 in the Donald J. Trump campaign,
16 were there any complaints or concerns raised by
17 anyone regarding sexual harassment or issues related
18 to sexual harassment?

19 A During the campaign, no, not to my
20 knowledge. Not to me directly and not to my
21 knowledge.

22 Q Okay. Same question regarding gender
23 treatment or gender discrimination.

24 A Not to me directly and not to my knowledge
25 generally; and, you know, Donald J. Trump did what

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1 no Republican had ever done as a Presidential
2 nominee, which is elevate a woman to the top job.

3 So no, I hadn't heard nothing of
4 that.

5 Q Well, to be sure, the question is not
6 about Mr. Trump himself. It's about anyone in the
7 campaign. I just want to be clear. It's not about
8 Mr. Trump.

9 A Not to me directly and not -- and not to
10 my knowledge generally.

11 Q Okay. When you say Mr. Trump elevated you
12 to the post, you were the third campaign manager
13 that he had selected for his campaign, correct?

14 A Yes. I'm pretty sure Manafort might have
15 had a different title; but I think the day-to-day
16 duties were the same as Corey Lewandowski, who had
17 been fired in June; Manafort, who had been let go in
18 August; and then, yes, me.

19 And -- and just, again, to speed
20 things up and complete the sentence. I was already
21 on the campaign. They were already a client of my
22 firm. I was one of the five polling firms that did
23 polling for the Trump-Pence campaign, and I was his
24 senior adviser before he asked me to be campaign
25 manager.

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1 Q Right.

2 So the first two individuals that
3 Mr. Trump selected as campaign managers were men,
4 correct?

5 A That's correct -- correct.

6 Q Okay. When you say you didn't -- I'm
7 sorry? Is there...

8 I'm sorry. I thought I heard
9 something.

10 When you say you didn't hear of any
11 complaint regarding gender mistreatment or gender
12 discrimination, do you recall a Jessica Denson
13 making any such complaints that you heard of?

14 A I know about -- I know her making -- I
15 know of her making complaints after the fact -- in
16 other words, I know of her complaints now. She is
17 also, like you, in litigation against the -- has
18 sued the Trump campaign from 2016. Yes. I have
19 testified in that action.

20 Q Right.

21 And in that testimony, you met with
22 Ms. Den- -- you stated that you had met with
23 Ms. Denson a few times during the campaign?

24 A I mean, we're going back almost eight
25 years now; but yes, whatever I testified, I will

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1 **stand by. Because I testified over a year ago.**

2 **Yes.**

3 **I'm sure I met with her --**

4 Q And is that --

5 (Simultaneous speakers.)

6 BY MS. DELGADO:

7 Q Sorry?

8 **A I'm sure I -- I met with her about her**
9 **duties, yes.**

10 Q So in those meetings, she did not raise
11 concerns about mistreatment based on her gender or
12 that any men were mistreating her?

13 **A Well, that's different. If you happen to**
14 **have --**

15 Q Okay. Let's -- let's break --

16 (Simultaneous speakers.)

17 **A If you happen to have -- happen to have a**
18 **male superior and you don't like your assignments or**
19 **what's happening, that's different than being**
20 **mistreated based on your gender.**

21 BY MS. DELGADO:

22 Q Absolutely.

23 So I'm asking, did she make any --
24 did she raise any concern where she said she felt it
25 was based on her gender or based on any sexual

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1 rejection?

2 **A She may have. I don't recall. She may**
3 **have.**

4 Q Okay. Fair enough.

5 And when did you join the White
6 House, Kellyanne?

7 **A On Day 1, January 20th, 2017.**

8 Q Okay. And you were there through what
9 date?

10 **A September -- September 4th, 2020.**

11 Q Okay. Did you have -- I assume, but
12 correct me if I'm wrong.

13 Did you have -- given that Mr. Trump
14 was running again, did you have contact with the
15 campaign or were you kept abreast in any way about
16 anything with the campaign?

17 **A That's a great question. Yes and no is**
18 **the answer.**

19 Yes to the extent that those trying
20 to exclude me from the campaign, I'm sure because of
21 my official capacity of the White House, they at
22 some point said, Well, we're going to make Kellyanne
23 an offer. If she's leaving the White House, come to
24 the campaign, give her her own staff, her own
25 airplane, her own schedule.

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1 And it was presented to me that I can
2 do that along with Ivanka Trump, Don Jr., and Mike
3 Pence. And I just thought, I'm leaving for my kids,
4 and I'm going to stick with that. So I did not
5 accept that offer.

6 Maybe once in a while, Brad Parscale,
7 who was the campaign manager; Bill Stepien, who was
8 the campaign manager after Brad was fired; Jared,
9 who fancied himself the campaign manager -- I mean,
10 these people, once in a while, would tell me what
11 was going on. But I'm fairly critical of the 2020
12 campaign. I wrote about it in my book, and that
13 won't change.

14 Q Do you recall hearing of any complaints --
15 any gender-related complaints from that campaign?

16 A In the 2020 campaign?

17 Q Uh-huh.

18 A No. I'm not sure it ever would have come
19 to me unless it was public.

20 Q Sure.

21 What about sexual harassment, same
22 question?

23 A No, not that I recall.

24 Q Pregnancy discrimination, same question?

25 A No, not that I recall.

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1 Q What -- what complaints, then, going
2 outside of those categories, did you hear about from
3 the 2020 campaign related to any type of
4 discrimination?

5 MR. FLOOD: Object to form.

6 (Simultaneous speakers.)

7 BY MS. DELGADO:

8 Q Or protected class treatment?

9 A **Nothing. Any complaints I heard were**
10 **about the strategy of the campaign and the absence**
11 **of the campaign manager, who seemed to live in**
12 **Florida.**

13 Q Fair enough.

14 Speaking of that campaign manager, I
15 have a question. He was recently deposed and asked
16 about the amount of money he made from the 2016
17 campaign. Let me just close this out.

18 A **Is this -- is this Mr. Parscale?**

19 Q Yes, Mr. Parscale. Yes, Brad Parscale.

20 Would the statement that -- given by
21 Mr. Parscale that he only made about \$200,000 from
22 the campaign seem accurate to you.

23 A **It seems low; but the -- the way his**
24 **business worked as a data and digital ad guy, most**
25 **of the money that went to his firm probably went**

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1 right back out to pay Google, YouTube, Facebook,
2 NBC, ABC, CNN, Fox News.

3 So I know a little bit about the way
4 that industry works. Not enough to say with any
5 kind of confidence or factual knowledge about what
6 Mr. Parscale made, but I would think it's easy to
7 find just because of the FEC reports.

8 Q Okay. And do you recall Mr. Trump
9 expressing at any point frustration regarding the
10 amounts that he believed Mr. Parscale was earning
11 from the campaign?

12 A Yes.

13 Q Can you tell me about that, please?

14 A I recall it was a Saturday, and Mr. Trump
15 was in -- in his residence. We were all at the
16 campaign. Maybe he was going, so I'm sure he was
17 getting on the plane to go campaign. And he
18 expressed that to Dave Bossie, who was deputy
19 campaign manager, and me.

20 I think the President must have seen
21 a report or somebody must have said to him, Brad's
22 firm is getting X millions of dollars. And then
23 came down on Brad somehow, and then it was explained
24 to him -- I suppose by Brad or Jared or someone, but
25 I'm guessing there -- that what I just said, which

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1 is a firm like that takes the money, and then it
2 goes right back out in disbursements to buy ad space
3 and time.

4 And in the Trump campaign in 2016, we
5 didn't have a lot of money; and so we got a little
6 creative. And we did 50 -- roughly 50 percent
7 traditional television ads and 50 percent online
8 ads.

9 But either way, I think it was Mr.
10 Parscale's firm that was the lead purchaser for
11 the -- the -- to -- what's called in the business,
12 reserve time to then -- and then to place ads, maybe
13 immediately or maybe closer to election day.

14 Q And do you recall reading about real
15 estate purchases that Mr. Parscale and his wife made
16 shortly after the campaign concluded?

17 A I don't know if I read about it or I just
18 knew about it. Something in Florida, I believe.
19 They either did live in Florida or were going to
20 live in Florida -- I think he actually lived in
21 Texas, and then they were going to move to Florida,
22 the Fort Lauderdale area.

23 Q And do you recall reading about any
24 lucrative purchases, cars or homes that Mr. Parscale
25 made?

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1 A He's a pretty flashy guy. I think we -- I
2 have read that in profiles about him. I'm not sure
3 when I read that. It could be 2020. It could be
4 2018. It could've been right after the campaign.

5 So I'm not sure when I read that
6 because I'm not sure when the purchases made. But
7 yes, that is some -- that is something that I have
8 definitely been exposed to over time. Haven't
9 thought about it in a long time.

10 Q Why was Boris Epshteyn removed from his
11 White House position?

12 A I'm told that Boris Epshteyn was removed
13 from his White House position in roughly March of
14 2017, as I recall, because he had received calls
15 from someone in Russia. And it turns out -- that's
16 what I was told.

17 And it turns out -- his -- his -- his
18 immediate boss was Sean Spicer, the White House
19 press secretary, I would think, who was doubling as
20 communications director for the White House.

21 And the way it was explained to me --
22 I can't even remember who said it, but it was
23 explained to me that he left because he was
24 receiving calls from Russia. And I -- I happen to
25 know as fact that Boris and his parents -- he's an

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1 only child -- they emigrated from Russia when Boris
2 was about 11 years old from -- so it's absolutely
3 possible that he has relatives calling him from
4 Russia.

5 But that's all I ever knew of that.

6 Q So that's not the -- the definitive
7 reason. That's just what you heard?

8 A That's what I heard the reason was. I
9 mean, there were a lot of people coming and going in
10 the Trump White House in those first two, six months
11 definitely. So -- and he was one of them.

12 I'd say in and around March of 2017.

13 Q So what you had heard is that he was
14 removed from a White House post because he received
15 calls from Russia; is that correct?

16 A Yes. I think -- I think people -- I
17 think, when Comey and crew were really trying to
18 investigate or -- he had made a comment to
19 President-elect Trump on January 6 that's been
20 reported -- January 6, 2017, ironically, that one.

21 It's been reported, you know, and he
22 took them aside about we're just checking this out
23 about Russian contacts. And I -- I just always
24 assumed because Boris went on to have a -- continued
25 to have a pretty good relationship with President

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1 **Trump, so -- I think he went and took a job, if I'm**
2 **not mistaken, at a -- a different. So I think he**
3 **had a pretty good relationship with President Trump.**

4 Q So what you heard was nothing related to
5 anything to do with a female?

6 A Me? No. I never heard that.

7 Q And did hear anything about Boris Epshteyn
8 making an unwanted advance on a female during
9 inauguration during the -- I'm sorry, during the
10 transit period?

11 A During the what? The transition?

12 Q Yes, transition period.

13 A Not that I recall. And remember, he
14 wasn't in New York with us at transition. He was --
15 he wasn't with Trump for America, which was the
16 transition entity. He was, as I recall, had a
17 communications position for the inaugural committee.
18 So I believe he was in Washington, D.C.

19 Q Right. The inaug- -- I should have said
20 the inaugural committee, been more specific than the
21 transition period.

22 This was an allegation made about the
23 inaugural committee. You did not hear anything
24 about Mr. Epshteyn making an unwanted advance on a
25 female during the inauguration committee?

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1 **A** Not that I recall. I mean, I know his
2 wife and his small child at the time, so not that I
3 recall. Somebody may have said it at some point,
4 but not that I recall. And certainly not, Oh, my
5 God, Kellyanne, here's a complaint and here's a -- a
6 whole process and -- so no.

7 And I may have read that somewhere
8 else after the fact. I mean, he's been profiled
9 since, so it's totally possible I've read that in an
10 article as an allegation after. But not at the time
11 that I recall.

12 **Q** Why was Rob Porter permitted to work in
13 the White House?

14 **A** Permitted?

15 **Q** Uh-huh -- let me rephrase it.

16 According to reports, not one, but
17 two of Mr. Porter's ex-wives notified the FBI prior
18 to the Trump administration commencing on
19 January 17, that they had both been victims of
20 Mr. Porter's abuse.

21 Do you know why he was permitted to
22 work on the -- in the White House through -- I
23 believe spring of 2018?

24 **A** I don't know except that I learned about
25 those -- those allegations from his ex-wives after

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1 he was in the White House. I think he left in or
2 around early February 2018. I remember the date
3 because my mother had surgery that day at
4 GW Hospital, and I was called back from there to the
5 White House for something else. So I -- I had that
6 date in my mind, early February 2018. But I never
7 knew that it was made public, until I think one of
8 the ex-wives was on camera saying this.

9 It wouldn't be for me to know why
10 somebody was permitted or not permitted to work in
11 the Trump White House unless I was specifically
12 consulted about it. So...

13 Q Fair enough. This is all, of course,
14 based on what you know or if you do have any
15 knowledge.

16 A Right.

17 Q If you don't have any --

18 (Simultaneous speakers.)

19 A If I recall, yes. Yes.

20 BY MS. DELGADO:

21 Q Correct.

22 Do you have any knowledge or any idea
23 why he was permitted to work, not in the -- in the
24 White House, but in the Oval Office despite these
25 allegations being raised even prior to commencement

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1 of the administration?

2 **A** I would have no knowledge about that
3 because they weren't raised to me. I would not have
4 been in that line of conversation. If you're saying
5 it was the FBI who knew this or was told this, that
6 wouldn't have affected me at all, meaning I -- that
7 would have not crossed my desk at all.

8 **Q** Sure.

9 Did you ever hear anything about it?

10 **A** No. The first time I ever heard was when
11 it was made public, and I believe that we all saw
12 one of his ex-wives on -- definitely her voice, I
13 think on video, as I recall.

14 So I would also say his job -- he had
15 a very big job. He -- he had -- he was staff
16 secretary, which is a very big job. And so this --
17 staff secretary, by its very design, would need to
18 be in the Oval Office on a fairly regular basis to
19 have the President sign documents or review
20 documents that staff secretary had signed off on
21 themselves, had approved.

22 **Q** So you were aware -- you became aware of
23 the reports when the rest of the public did, I
24 presume is what you're saying --

25 **A** Yes.

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1 Q -- in February 2018?

2 And do you recall, in those reports,
3 that Mr. -- it was reported that Mr. Porter had a
4 domestic violence or actually physical violence
5 entered into against him by one of his ex-wives? Do
6 you remember reading that?

7 A If it was readable, I'm sure I did. I
8 don't recall the specifics.

9 Q Okay. So again, limited to what you heard
10 or know, do you have any information or did you hear
11 anything as to how someone with an order regarding
12 physical violence, how does someone get a staff
13 secretary, which you just called "a big job," in the
14 Oval with a domestic violence, physical violence
15 restraining order on their record? Do you know?

16 A Well, I don't -- I don't know. What I do
17 now is that we're all vetted. We are -- we have
18 to -- you have to submit a very detailed, under
19 penalty of perjury, you know, set of documents, as I
20 recall. I don't think this is breaking news, and
21 it's probably -- those documents are probably
22 easily, you know, findable publically.

23 So it -- I wouldn't know if he lied
24 about or if the FBI researched it and what they
25 decided. I -- I literally would not know any of

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1 **that.**

2 Q So you -- but did you hear, is what I'm
3 asking. Did you hear anything?

4 A No, I never heard -- I never heard a thing
5 about Rob Porter that was negative.

6 And I'm going to go one further. I
7 don't think I even knew he had been married before,
8 let alone twice.

9 Q Okay. Trying to pull all the exhibits for
10 one time, to go as quickly as possible. So I'll
11 skip over some.

12 What -- what hiring de- -- who made
13 the hiring decisions for the White House? If you
14 could talk to me about that.

15 A I mean, ultimately, President Trump; but
16 he took the advice and counsel of those who were
17 also in charge of such things. I would say those
18 who had the top jobs in TFA, Trump for America,
19 which was the official transition entity.

20 Chris Christie was let go from that.
21 He had that position basically -- I don't know if it
22 was called that, but he -- he was the chair of
23 transition for a while.

24 I think Rick Dearborn was in there at
25 some point after Christie left. Definitely Jared.

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1 His friend Nick Ayers was -- was also involved.

2 Reince Priebus. I think for the
3 comms and press shop, Sean Spicer. Definitely Steve
4 Bannon.

5 I mean, they sat in a lot of the
6 interviews for cabinet positions. They put
7 together -- I mean, Spicer had put together, like, a
8 flow chart of people to work in press and comms.

9 Other than that, I mean, the
10 President himself might ask me about someone; and if
11 I know them, I would tell him my thought of their
12 work. If I didn't know them, I would say, I don't
13 know that person's work. I know them socially or I
14 know them tangentially, but here are -- here are the
15 three people who should be called about them. They
16 worked for a senator or they worked in the private
17 sector or they worked for a nonprofit.

18 So it would be like that, but -- you
19 know, they're -- the people -- and ultimately, Mike
20 Pence, the Vice President-elect, he also had the
21 official title at transition like the -- I'd say the
22 chair or whatever the title was, of transition.

23 Q Is there anything that makes you believe
24 that -- is there anything you can point to or any
25 document that makes you believe that it was in their

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1 role as a member of transition that individuals were
2 making these recommendations?

3 A I just know that by being at transition.
4 You know, they'd say, Oh, well, we're looking at Rex
5 Tillerson or Mitt Romney for State or -- once in a
6 while, I might be in those meetings because I,
7 unlike some of the others, actually had worked in
8 Washington, D.C. or on campaigns or in Republican
9 politics. And then there were people who had worked
10 in presidential administrations before who were
11 fairly helpful.

12 The other thing I should mention is
13 transition always had a D.C. presence from the
14 beginning, and so there were B check teams that had
15 done a ton of -- you know, it's called spadework,
16 work over months, if not a year to try to get B
17 check teams for -- for department of energy, for
18 department of interior, for the justice department.
19 So I think the people in Washington have been
20 working on that for quite a while.

21 I can't remember specifically. I
22 know there was a man involved. I can't remember who
23 it was. And there was definitely a woman named
24 Becky Norton Dunlop from Heritage was helpful with
25 that as well.

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1 But I -- I would be remiss in not
2 sort of crediting and recalling the work over
3 significant periods of time of dozens of people in
4 Washington, D.C.

5 Q So they were planning for the
6 administration operations.

7 A Yes. And they also -- you know, for
8 example, you mentioned Mr. Porter.

9 I believe, but I'm just remembering
10 this so I -- may not be true. I recall that he
11 worked for United States Senator at some point.
12 Maybe -- maybe Senator Orrin Hatch.

13 So in other words, somebody would
14 have said, Oh, we know so-and-so from the judiciary
15 committee and the Senate. We know so-and-so who
16 worked in the Bush administration as an under
17 secretary of energy. They may want to serve again.

18 So I think those kind of things. And
19 people, of course, sent their resumes and asked for
20 positions.

21 Q So it sounds like it was very
22 free-flowing. Is that correct as far as --

23 A Yeah -- yes and no. I think it was
24 free-flowing to the extent that there were people
25 around President Trump who never thought he'd win

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1 and were just trying to get through November 8th and
2 get back to their lives, so they were a little
3 surprised. And then had to quickly say, They always
4 knew he was going to win and they helped him win,
5 and now they're going to help him staff
6 administration.

7 And then there were people who were
8 in charge of this. There were people in Washington,
9 D.C. working on this. I think some of them paid;
10 but most of them, volunteer.

11 And we did have a transition office
12 here in D.C. I forgot about it, to be frank with
13 you. I hadn't thought about it in years. But I had
14 visited it a few times during transition if I was
15 down here for something.

16 So that was -- that was a real
17 office. That was a -- but I -- look, ultimately,
18 the principal, the President made the hiring
19 decisions; but he took a lot of the recomm- --
20 for -- for cabinet positions, senior staff. He took
21 a ton of recommendations from people who he had put
22 in those positions, though.

23 So he didn't -- I didn't get approval
24 from President Trump or Vice President Pence about
25 the -- the team I hired, for example. He's like, I

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1 **want you to be counselor to the President. You hire**
2 **who you need to.**

3 Q So did recommendations also come in from
4 individuals who weren't necessarily part of the
5 transition team, which was quite small?

6 **A I'm sure they did, yes.**

7 Q And -- I'll just ask you about this now,
8 then.

9 Did the President express any view
10 particularly -- we've heard from Sean Spicer, who
11 qualified my tweets. And I believe we know -- when
12 I say "my tweets," I'll be -- I'm referring to my
13 tweets, which you might recall, from December of
14 2016.

15 Do you recall those, or would you
16 like me to show you an exhibit --

17 (Simultaneous speakers.)

18 **A You -- you definitely have to show me your**
19 **tweets. I'm not a big social media person. I don't**
20 **really look at Twitter. I'm told I have millions of**
21 **followers. They'll need to wait.**

22 BY MS. DELGADO:

23 Q You do.

24 **A So yes, I -- I definitely don't -- I don't**
25 **require -- I don't remember your tweets. I'd like**

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1 **to see them.**

2 Q Okay. Do you recall Mr. Trump giving any
3 opinion once it -- do you recall my pregnancy
4 becoming a national news story over Christmas? Do
5 you recall that?

6 **A Your pregnancy what?**

7 Q Becoming a bit of a national news story --
8 I'm using Sean Spicer's qualification -- during
9 Christmas in 2016.

10 **A Yes. I can't give you the dates, but I am**
11 **aware of -- of that being made public, yes.**

12 Q And do you recall Mr. Trump's remarks or
13 position or viewpoint on the -- the situation?

14 **A No. I think, if he said anything, it**
15 **would have been along the lines, Is she okay?**

16 **No, I -- I don't recall anything**
17 **specific from Mr. Trump -- Mr. -- President-elect on**
18 **that.**

19 Q Okay. Because Mr. Spicer, given that he
20 said it was -- I believe he called it a level 5
21 fire. But you don't recall Mr. Trump expressing an
22 opinion on it?

23 **A Your pregnancy was a level 5 fire? No, I**
24 **don't. No.**

25 Q Okay. Okay. What about Jared Kushner?

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1 **A What about him?**

2 **Q Did he -- what did he express, if you**
3 **recall, regarding the --**

4 (Simultaneous speakers.)

5 **A I don't recall -- I don't recall -- I**
6 **don't recall Jared Kushner ever addressing your**
7 **pregnancy or the birth of your child, God bless you,**
8 **with me.**

9 BY MS. DELGADO:

10 **Q Because Mr. Miller, Jason Miller has**
11 **stated that Mr. Kushner called him specifically**
12 **about it over Christmas and was the one who informed**
13 **Mr. Miller that he would need to put -- hit pause on**
14 **his White House job.**

15 Do you recall Mr. Kushner similarly
16 giving any indication or opinion on the issue
17 that -- either to you directly or that you heard of?

18 **A No. I don't recall Jared Kushner being**
19 **involved in that at all vis-a-vis me. He -- it's**
20 **possible he called Mr. Miller. It's possible he was**
21 **asked to. It's possible -- I -- I would have no**
22 **knowledge of that at all.**

23 I mean, what you just said is true,
24 that Mr. Miller was supposed to come in as White
25 House communications director and then did not. But

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1 **no. I don't know --**

2 Q Did Mr. --

3 **A -- who called whom.**

4 Q Sorry. If I interrupt you, by the way,
5 it's just because sometimes there's a slight delay.
6 So I apologize.

7 **A You're not interrupting me. It's fine.**

8 Q So did -- so Mr. Kushner, and I presume,
9 perhaps -- I'll split it up between Mr. Kushner and
10 Ivanka.

11 Mr. Kushner had -- or purported to
12 have decision-making ability in terms of White House
13 jobs, given what Mr. Miller has stated. Is that
14 correct?

15 **A Yes, that is correct.**

16 Q Okay.

17 *(Discussion off the record.)*

18 BY MS. DELGADO:

19 Q You might not recall this, so please tell
20 me if you don't. But do you recall at some point
21 hearing that I joined the America First PAC in the
22 spring of 2018 -- in January specifically of 2018?

23 **A 2018? No, I never knew that actually.**

24 Q Do you recall hearing that I was
25 terminated from that PAC in circa April 2018?

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1 **A No.**

2 Q Okay. So based on --

3 **A First America PAC (sic)? What is the**
4 **First America PAC? Was that -- was that tied to the**
5 **2020 reelect?**

6 Q No. That was the America First PAC that
7 was started by Rick Gates; and then Katie Walsh took
8 over, Brad Parscale took over, Katrina Pearson was
9 there?

10 Remember --

11 **A Okay. Yes. Now -- now I know what you're**
12 **talking about. It no longer exists, right?**

13 Q The main PAC, the Mercers were -- were
14 interested in leading it; and then Brad kind of,
15 instead, said I --

16 **A Okay.**

17 Q That main outside super PAC. It's where
18 Katie Walsh went after she was removed from the
19 White House.

20 **A Okay.**

21 Q Okay. So based on your answer saying you
22 weren't even aware that I was there, I guess your
23 answer --

24 **A I was not aware that you were there and**
25 **then not there, no.**

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1 Q Okay. So, then, you would have no
2 information as to why I was terminated, correct?

3 A No.

4 Q Okay. Fair enough.

5 (Discussion off the record.)

6 BY MS. DELGADO:

7 Q So to double back, Kellyanne -- and I
8 apologize if this has been asked and answered. Just
9 trying to clarify if I did ask this.

10 So from your recollection, Mr.
11 Trump -- then, Candidate-elect Trump -- did not
12 express any opinion on the issue of -- that you can
13 recall of my pregnancy?

14 A No. I don't recall that at all.

15 Q Okay. Did he ever say that I should not
16 be brought into the White House?

17 A Not to me. Not that I recall.

18 Q Did he say that I should be brought into
19 the White House?

20 A No. Not -- no, I don't recall that. I
21 think that's -- that's something he would have put
22 the press secretary in charge of, and then present
23 to him who that person -- in this case, Sean
24 Spicer -- wanted on the team.

25 I should probably say, I said no to

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1 press secretary. I said no to communications
2 director. And when I did say I was coming to the
3 White House, it was late. It was December 22nd, as
4 counsel to the president.

5 I did not want a press and comms job.
6 I wanted a policy job. And I did -- I wasn't going
7 to come at all. I came in -- and this is relevant
8 to your question just because I made very clear to
9 Miller and Spicer that I didn't even put press or
10 comms in my title. Counsel for the President was
11 giving them full latitude to do what they wanted in
12 those two spaces.

13 So I kind of removed myself from all
14 of that. And I don't recall anything from President
15 Trump about you specifically, and certainly not
16 negative.

17 Q Fair enough. And this is all if you know,
18 if you heard.

19 A Yes, I know. Of course.

20 Q And I realize we're going back a long
21 time.

22 Okay. Did you hear Mr. Trump give
23 any opinion on Mr. Miller and his position in the
24 White House?

25 A Well, he made him communications director,

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1 so he elevated him to a very big job. It's very
2 similar, if not the exact title that Jason Miller
3 had on the Trump campaign.

4 And I -- I think, at some point, it
5 just became known, I guess, that Mr. Miller was not
6 going to take that job and someone else would need
7 to take the job. And Sean Spicer said, I'll do both
8 jobs.

9 So that's what I remember. I can't
10 remember the Presidents's direct involvement in any
11 of that. I mean, he does have a tendency to tell
12 people, Take care of your family, do what you need
13 to do. When I told him I was leaving the White
14 House, he said, No, stay. You can take care of your
15 family and stay. But -- I mean, that's just -- he's
16 just a nice person, and he -- that's his first
17 instinct always, which is take care of your family,
18 do what you need to do. So...

19 Q Do you have any reason to believe that
20 Mr. Trump was -- was not aware of the pregnancy? I
21 mean, surely, he would have been told why this
22 person that you just said he appointed is now no
23 longer taking the role.

24 A No, no. I -- I believe he did know about
25 the pregnancy.

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1 Q Okay.

2 A And -- yes, he would have known about the
3 pregnancy. I think.

4 Q But you don't recall what his position or
5 viewpoint was on it, is what...

6 A No. I can't imagine he expressed a
7 position or viewpoint on someone's pregnancy.

8 Q Sorry. I should -- I should be clearer.
9 Not on the pregnancy. On whether I
10 should come into the White House or not.

11 A That was not discussed as far as I can
12 remember in -- in the context of your pregnancy.
13 No. I think the -- the focus was on the person who
14 had the job, Jason Miller, and what he was going to
15 do. Yeah.

16 Q So your position was that I didn't have a
17 job at that time?

18 A I don't remember. Did you? I don't
19 remember.

20 Going into the -- going into the
21 administration? Going into the White House?

22 Q Yes. I was already on an org chart.

23 A That's -- that's very possible. I think
24 most of the people on the campaign who wanted the
25 position were on the org chart.

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1 Q You said most of the people on the
2 campaign who wanted a position were on an org chart,
3 correct? Did I hear you --

4 A Yeah.

5 Q Yeah. And that brings me to another
6 question. We can just -- we're speeding through
7 these.

8 Who from the campaign, Kellyanne, can
9 you recall -- excuse me -- who wanted a White House
10 job but did not receive one?

11 A Oh, lots of people. Many people.

12 Q From national level --

13 (Simultaneous speakers.)

14 A Because the org chart -- my whole point is
15 both -- both statements are correct, which is people
16 who wanted the position -- I should have said
17 everyone.

18 But typically speaking, people who
19 express an interest in serving the administration
20 were put on an org chart; were asked where they
21 wanted to be, et cetera. It doesn't mean they were
22 hired.

23 And that goes for everybody from
24 Chris Christie to Rudy Giuliani to -- gosh, I can't
25 remember his name in the -- in the comms department.

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1 Maybe -- I can't remember his name.

2 But there were people who absolutely
3 wanted to work in the White House administration who
4 didn't get those jobs. The jobs are finite in
5 number, and I think they're -- based on -- based on
6 whatever Spicer saw in somebody's merit or how they
7 were going to execute on the duties of the press
8 shop or the comms department.

9 So -- and I specifically and publicly
10 said I did not want a press and comms job. Please
11 put somebody else on TV. I begged. I -- in fact, I
12 said many times, We're going to seat a cabinet,
13 they're going to be confirmed, and they'll be the
14 subject matter experts for their respective
15 departments. Please call them. But, of course,
16 that doesn't work for Mr. Trump. He wanted me out
17 there.

18 But the point is I took myself out of
19 the hiring of the press and comms shop, and I think
20 Spicer and Reince and Bannon and Jared were all too
21 happy to have me not involved in the hiring.

22 BY MS. DELGADO:

23 Q Right. Absolutely. I don't take the
24 position that you were involved in the hiring.
25 You're just a third-party witness just to -- testify

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1 to what you recall hearing --

2 **A Sure.**

3 Q -- et cetera.

4 When -- you mentioned Chris -- you
5 mentioned two examples of individuals -- three
6 examples of individuals from the campaign, and I --
7 I -- when I asked about what individual -- sorry.
8 Let me back up. I'm getting a word salad.

9 When I asked you about what
10 individuals from the campaign you recall who wanted
11 a White House job and didn't get one, you said the
12 name Chris Christie, Rudy Giuliani, and a comm
13 staffer whose name you don't recall. Let's go
14 through those.

15 Chris Christie was not --

16 (Simultaneous speakers.)

17 **A Let me also add to the list because it's**
18 **also a very prominent person in the campaign, Dave**
19 **Bossie, the deputy campaign manager. He did not get**
20 **a White House job or an administration job, and that**
21 **was very surprising.**

22 BY MS. DELGADO:

23 Q Is it because he didn't get the specific
24 White House job he wanted?

25 **A No.**

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1 Q Because there's a difference.

2 A No. I think people got in his way.

3 Q He was told he could not have any White
4 House job.

5 A I'm not -- I don't know what Mr. Bossie
6 was told. He just -- all I know is he did a great
7 job on the campaign as my deputy, and then did not
8 get a White House job and wanted one.

9 Q Well, did not go into the White House --
10 (Simultaneous speakers.)

11 A He did not go into the White House or the
12 administration, no.

13 BY MS. DELGADO:

14 Q But you don't know if that's because he
15 asked for a particular job and didn't receive that
16 job?

17 A I don't know.

18 Q Right.

19 And is it possible that Mr. Bossie's
20 very close colleague, Brian Lanza, who took a
21 lobbying job instead and opted out of the White
22 House job, is it possible Mr. Bossie ultimately
23 decided to stay in private practice?

24 A Yes, it is -- it is -- it is possible, and
25 there are -- I was thinking about the org charts

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1 **before. There are people who were offered jobs who**
2 **didn't take them. They went and did something else.**

3 Q Right.

4 And it's more lucrative financially
5 not to go into the White House for the immediate --

6 (Simultaneous speakers.)

7 **A I can tell you this --**

8 BY MS. DELGADO:

9 Q Sorry?

10 **A I can tell you this with certainty. I can**
11 **tell you this with certainty: It is not lucrative**
12 **to be in the White House, so that part is true.**

13 Q Right.

14 So -- so my point is it's possible
15 either way that Mr. Bossie ultimately opted not to
16 go in and -- like Brian Lanza, his colleague,
17 ultimately opted to stay in the private sector.

18 **A Yes. There were -- I -- I was going to do**
19 **that. So yes, that's -- that's definitely the route**
20 **many took.**

21 Q And Chris Christie was not a member of the
22 campaign, correct?

23 **A Well, I feel -- I don't know if he had a**
24 **title, certainly not competition. He was the**
25 **sitting governor of New Jersey, so he couldn't be a,**

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1 quote, official member of the campaign. But he
2 was -- he and Rudy Giuliani were the two top
3 confidants of President Trump on the campaign. I
4 would say in terms of peers, other elected officials
5 and maybe of a certain age, et cetera.

6 So he was definitely very involved in
7 the campaign. Famously dropped out of the race and
8 endorsed Trump early, like February of 2015, I'll
9 say. So -- maybe 2016. Sorry, 2016.

10 So in any event, he def- -- you know,
11 he wanted jobs. He was very upfront about that.
12 Justice department or attorney -- you know, attorney
13 general or something else, chief of staff. So yeah.

14 But not everybody got a job and not
15 everybody who was offered a job took it. I think it
16 was no different than most workplaces.

17 Q Well, you're aware Mr. Christie has a
18 longstanding history with Jared Kushner, correct?

19 A I'm -- I am aware of -- I have seen and
20 been part -- witnessed directly their, quote,
21 burying the hatchet and their relationship of
22 working together both on the Trump campaign, the
23 Trump transition a little bit. And then, in the
24 Trump White House, Governor Christie was a frequent
25 visitor and guest and -- including in Mr. Kushner's

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1 office and at different meetings, et cetera.

2 He was very helpful to us as chairman
3 of the Opioids Commission, for example. But, you
4 know, continued to be a friend of the President and
5 was around a lot and, after he was governor, was
6 offered a couple of jobs by the President again, I'm
7 told. But I think had a very lucrative business
8 outside of the administration, to your point.

9 Q So to that last point of yours, it's
10 possible Mr. Christie -- same possibility as
11 Mr. Bossie -- ultimately opted not to pursue a White
12 House job.

13 A He opted not to take one, yes.
14 Ultimately, that's right. Several were offered to
15 him over time.

16 Q Okay. And you're not aware whether
17 Mr. Kushner actually did truly bury any gripe he has
18 with Mr. Kushner (sic) based on Mr. Kushner's
19 prosecution of Mr. Kushner's father in the past,
20 correct?

21 A I think you mean Christie in there too,
22 but that's okay. I think we'll -- the court
23 reporter will understand.

24 Well, I don't know what's in
25 anybody's heart or what's in their personal

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1 relationship. I would have no knowledge of that. I
2 just think that they found a way to work together
3 after the fact.

4 Q Okay. And Mr. Giuliani was not a member
5 of the campaign, a staff member or a contractor to
6 the campaign, correct?

7 A I think his position was probably
8 volunteer. I can't imagine he was compensated.
9 He's a friend of Donald Trump's who wanted to be
10 there for him as somebody who had been mayor of New
11 York, had run for President himself. Somebody who
12 would go on TV, as would Governor Christie on behalf
13 of President -- excuse me, Candidate Trump, and then
14 President-elect Trump.

15 So yeah. They're in the room for
16 debate prep. They're in the room for big moments,
17 so...

18 I always consider them part of the
19 campaign. Even if they were volunteers, they were
20 part of the daily rhythm. Governor Christie also
21 was the person in charge of taking Mr. Trump
22 downtown in New York for the National Security
23 Briefing, so that's -- that's a pretty weighty
24 responsibility.

25 Q So you're saying about Giuliani is that he

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1 wanted a White House job? You're aware that he
2 asked for a White House job and was told no?

3 **A Well, what -- first of all, when I say**
4 **"White House" -- I think when you say "White**
5 **House" -- I mean administration, so I'm talking not**
6 **in the structure of the White House or West Wing or**
7 **EOP so much as the cabinet.**

8 **So in the -- in the administration, I**
9 **was on a panel November 14th, 2016 with Mayor**
10 **Guiliani at the Four Seasons in Washington, D.C. We**
11 **were the two speakers that were interviewed, and he**
12 **said -- they said, What about, you know, Attorney**
13 **General? He said, No, I want Secretary of State or**
14 **something. It's public knowledge. It was**
15 **broadcast, but...**

16 **So I would say, to answer your**
17 **question, he -- he did say publicly he would take**
18 **jobs like that, but I -- I don't think they were**
19 **offered to him. But he remained --**

20 **Q Right.**

21 **A -- a very close -- very close confidant of**
22 **President Trump's and went on to have a lucrative**
23 **business outside of the White House.**

24 **Q So, perhaps, that's similar to Christie or**
25 **Bossie in that Mr. Giuliani as -- given the example**

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1 you just used, was seeking a specific extremely
2 prestigious role that many others are specifically
3 also in the running for. Secretary of State is what
4 he wanted, and then did not receive Secretary of
5 State.

6 **A I recall him saying that publicly, so I --**
7 **you know. I may be wrong. It was a long time ago,**
8 **but I recall him saying that publicly.**

9 **Q So -- again, to circle back to the**
10 **question. So can you think of any actual staffer at**
11 **the national campaign or contractor who wanted a job**
12 **and did not receive one? If you could give me a**
13 **name.**

14 **A Well, there were a number of people who**
15 **did not receive jobs. I don't know if they wanted**
16 **one.**

17 **I feel like there was -- there was a**
18 **staffer on the floor where you and I worked, which**
19 **was 14 --**

20 **Q Uh-huh.**

21 **A -- who -- either his nickname or his**
22 **actual him was Oz. I'm not sure he got a job offer.**
23 **There were people, I believe, in administration or**
24 **finance who did not get jobs.**

25 **Michael Cohen very much wanted a job.**

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1 Looked at himself as a campaign surrogate, et
2 cetera. He wanted a position. Made that very clear
3 to me personally, directly. I'm sure made it clear
4 to President Trump and others. Said it publicly.
5 So yeah.

6 Q So Michael Cohen wasn't with the campaign,
7 so is the answer -- the only answer, then, is --

8 A Michael --

9 (Simultaneous speakers.)

10 A Well, no. I have to -- I have to object
11 there.

12 Michael Cohen was very involved with
13 the -- with the -- with the campaign, except, you
14 know, as -- let me back up.

15 The fact is Michael Cohen was not a
16 member of the campaign. Not a contractor, not an
17 employee, not -- that wasn't his day job. But he
18 made himself involved in the campaign because of his
19 job at the Trump organization and because, long
20 before President Trump had a true campaign, Michael
21 Cohen was flying out to Iowa by himself or going up
22 to New Hampshire with Mr. Trump early on.

23 So he would go on TV as -- you know,
24 as the representative for the campaign. Even if it
25 said, you know, Special Counsel or Counsel to Donald

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1 J. Trump, Trump Organization Executive.

2 And he did not get a job. I think
3 there were very big names of people who wanted the
4 job and did not get a job. Mitt Romney interviewed
5 for Secretary of State. He didn't get the job.

6 I can think of six or seven people
7 who wanted secretary of interior and came to
8 interview for it and did not get the job. Sitting
9 members of congress, senators.

10 Lots of folks who want the jobs can't
11 get the jobs because they're finite in number. And
12 I can't recall everybody who worked on the campaign
13 and whether or not they wanted a job or got a job.

14 I think there was a woman named
15 Corina. She wanted a job and didn't get it. She
16 didn't get a job.

17 BY MS. DELGADO:

18 Q Corina was a member of the data
19 department, correct?

20 A I think so.

21 Q Phone bank administrator. Does that --

22 A Yes.

23 (Simultaneous speakers.)

24 A Lovely person. Great worker.

25 She didn't get a job.

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1 BY MS. DELGADO:

2 Q Okay. So, so far, actual staff members
3 or -- or independent contractors to the campaign, we
4 have -- and I'll try to see if I can find who this
5 is, a gentleman whose nickname was Oz, O-Z?

6 A I think so. It's been a long time.
7 Haven't heard from him since.

8 Q Okay. Nickname Oz and Corina from the
9 phone bank; is that correct? Is it C-O-R-I-N-N-A?

10 A One N.

11 Q One N, okay.

12 Anybody else?

13 A And her last name is -- yeah.

14 So yes, I'm sure there were. I just
15 don't have a running list of such things. But I'm
16 giving you very big names who wanted the job and
17 didn't get one.

18 And, you know, the deputy campaign
19 manager, the Governor of New Jersey, the former
20 mayor of New York, the senator -- I guess he was
21 senator at the time -- Mitt Romney failed, you know,
22 former Presidential candidate, wanted to be
23 Secretary of State.

24 Many people wanted these jobs, and --
25 you know, and -- and there were many people -- was

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1 **Katrina on the campaign? She didn't get a job.**

2 Q No. Katrina Pearson was offered deputy
3 press secretary and turned it down to go to the PAC
4 with Brad.

5 A Okay.

6 Q So she...

7 A That's my point, though. That's my point,
8 Ms. Delgado. I don't know who wanted a job and
9 didn't get it necessarily. I can say who didn't
10 work there, but I don't know who wanted a job and
11 didn't get it.

12 There's also -- there was a gentleman
13 named Daniel Gelbinovich, something like that. He
14 was one of the people helping me, and he did not
15 ultimately come in -- so I don't know. It's hard to
16 say, you know, who wanted the job and didn't get one
17 because I don't know if they were motivated, to your
18 earlier point, to go on the private sector. It's
19 possible.

20 Q Speaking of Daniel, he booked travel for
21 the campaign, correct?

22 A He booked travel for me, so I assume he
23 did it for other people too.

24 Q Yeah, I can show you -- let's do...

25 Sorry. Bear with me.

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1 Okay. I'm going to do Exhibit 1.

2 MS. DELGADO: Mark this as Exhibit 1,
3 Leila. I'm putting it up on the screen.

4 (Exhibit 1 was marked for
5 identification)

6 BY MS. DELGADO:

7 Q So now you see for sure that really was me
8 on the other Delgado Zoom entry.

9 All right. Let's see. Are you able
10 to see that?

11 MS. DELGADO: Is everyone able to see
12 that?

13 **A Let's see.**

14 THE STENOGRAPHER: It's showing.

15 **A Yes. I'm going to pull it -- hold on.**

16 BY MS. DELGADO:

17 Q I'm just -- if you -- I'm -- this is an
18 article from The Daily Beast, and I'll read aloud
19 the highlighted --

20 **A No, no. I just read it. I just read it.**

21 Q Okay. I'll just read it into the record.

22 It states -- the highlighted portion
23 is, Gelbinovich was a low-level staffer on the Trump
24 campaign, according to campaign sources, frequently
25 booking travel for senior staff, unquote.

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1 So I'll mark that as Exhibit 1.

2 Okay. So besides the gentleman with
3 the nickname Oz, besides Corina from the phone bank,
4 and besides Mr. Gelbinovich who booked travel,
5 anyone else you can think of as far as -- and I'll
6 close it out here because I know we've been on this
7 topic for a while. But anybody else you could think
8 of who wanted a White House job and was told no?
9 And I don't mean who wanted a specific job like
10 Secretary of State, but just a job in the White
11 House and was told no?

12 **A Yes. Chris Christie, Mayor Giuliani, Dave**
13 **Bossie -- I mean --**

14 **Q Actual --**

15 **A There were probably lots -- there were**
16 **probably lots of people told no honestly, I -- I**
17 **would think; but I don't know.**

18 **Q Okay. Once again --**

19 **A I don't know. I don't know because --**
20 **because I said no. Because I said no to press**
21 **secretary and comms director and everything else,**
22 **and then decided 45 days after the President was**
23 **elected that I would go to the White House and not**
24 **do the lucrative outside thing. But --**

25 **Q Yeah.**

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1 And it's fine --

2 (Simultaneous speakers.)

3 A So I really wasn't paying attention to
4 other people. If people said they wanted a job, I
5 said, Great, bring your resume to transition, here's
6 who you should talk to, et cetera. I'm always happy
7 to help that way.

8 I'm not sure everybody got a good
9 glowing report either from the people they reported
10 to. I don't know -- I didn't know everyone in
11 administration or data and digital, for example, so
12 I -- I don't know who asked for what.

13 BY MS. DELGADO:

14 Q Okay. I think verse -- going in circles
15 now on the same question.

16 So the only others were Chris
17 Christie, who wasn't with the campaign, and
18 Giuliani, who wasn't with the campaign. And Dave
19 Bossie, you've stated you're not sure if,
20 ultimately, he decided to go into the private
21 sector. Is that --

22 A He -- he and Michael Cohen absolutely
23 wanted jobs in the White House in the
24 administration. They didn't receive them. And
25 I'm -- I'm glad that Dave Bossie found a lot of

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1 success on the outside, including a couple best
2 seller books about President Trump and speaking and
3 consulting, et cetera. So that's great.

4 The -- there was something I wanted
5 to say about all this. I don't remember.

6 Q But you don't know if Dave Bossie wanted a
7 particular White House job and didn't get that
8 particular White House job, and then stayed in the
9 private --

10 (Simultaneous speakers.)

11 A Well, you just -- you just said you're not
12 talking about specific jobs. The example you gave
13 was Secretary of State, so I don't think it's
14 relevant. If he wanted a specific job, I think it's
15 relevant that he wanted a White House position and
16 did not get one.

17 BY MS. DELGADO:

18 Q Was he open to any White House position?

19 A I think he was open to many of them.
20 Yeah. He wanted to be where we were.

21 Q What makes you think he was open to many
22 of them?

23 A He's a close, personal friend of mine.

24 Q So he told you, I'll take any White House
25 job?

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1 **A** He did not say that, but there were more
2 than a few that he would take.

3 **Q** But you don't know if he opted to go --
4 stay on the outside, same as Brian Lanza?

5 **A** Brian Lanza said pretty early on he was
6 going to stay on the outside. He had a nice job
7 offer. I remember him telling me that. I think he
8 and his wife wanted to start a family.

9 Dave Bossie told me he would like to
10 work in the White House. I think the same was true
11 of, you know, a num- -- Corey Lewandowski, for
12 example.

13 There were people who didn't want to
14 come to the White House, wanted to be the RNC chair,
15 who didn't get that either. Ronna McDaniel got that
16 job. So there was -- you know, there -- there's
17 always going to be disappointment in every
18 administration because there's a finite number of
19 jobs; and, you know, we can't all get what we want
20 when we want it. That's a lesson of life, not the
21 Trump 2016 transition.

22 **Q** So your position -- because I'm just
23 hearing what you're claiming Bossie told you.

24 Your position is that Bossie, which
25 told you, that he would take any number -- a variety

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1 of White House jobs, and he was told no for each and
2 every one of those?

3 **A I didn't say he'd take any job. I'm**
4 **saying he would -- he was --**

5 **Q A number --**

6 (Simultaneous speakers.)

7 **A -- willing to take several different**
8 **senior positions for which he was qualified and was**
9 **traveling with Mr. Trump during --**
10 **Mr. President-elect during the transition and was**
11 **not getting an offer and didn't get an offer.**

12 **So --**

13 BY MS. DELGADO:

14 **Q What were those --**

15 **A And from my perspective as campaign**
16 **manager, Chris Christie, Rudy Giuliani, these people**
17 **were part of the campaign because they would go on**
18 **the television as -- representing the Trump**
19 **campaign. And the fact that they were volunteers**
20 **really didn't matter vis-a-vis who had authority,**
21 **who was in the room where it happened as it were.**

22 **They were for debate prep, they were**
23 **there on election night, they were there in the**
24 **residence, they were there for big moments. I know**
25 **that because they were there with me. So they were**

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1 absolutely part of the campaign that way.

2 And I say, of that immediate group,
3 the one person who did not -- three people who did
4 not get positions -- I mean, in debate prep, there
5 were seven of us, and I mentioned three that got no
6 position, Chris Christie, Rudy Guiliani, and Dave
7 Bossie.

8 Q Notwithstanding -- I know you maintain
9 that, in your opinion, they were part of the
10 campaign.

11 To circle back again, you have no
12 reason to believe that Jared Kushner had buried any
13 negative feelings he had about the fact that Chris
14 Christie put Jared Kushner's father in prison?

15 A Yep.

16 Q And Guiliani, you stated --

17 (Simultaneous speakers.)

18 A What -- what do I think? I mean, I don't
19 know what to think vis-a-vis -- I don't know what to
20 think vis-a-vis the hiring because I know that
21 President Trump has off- -- had offered a few
22 positions to Chris Christie over time, partic- --
23 including while he was governor, and then after he
24 left his governorship in 2000- -- it would have been
25 early 2018 he left his governorship, term limited.

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1 BY MS. DELGADO:

2 Q So why didn't Christie take them -- so he
3 was offered a role?

4 A You'd have to ask him that.

5 Q So -- sorry. Just to be clear, then. So
6 Chris Christie was offered a role, just later,
7 correct?

8 A That's correct.

9 Q Oh, okay.

10 And --

11 (Simultaneous Speakers.)

12 BY MS. DELGADO:

13 Q -- Giuliani -- Giuliani wanted Secretary
14 of State?

15 A That's what he said.

16 Q Okay. And Dave Bossie, you say wanted --
17 was interested in several roles. Do you recall
18 which of those roles they were? What the roles
19 were?

20 A No. I think he'd probably go for deputy
21 chief of staff of some division. We had several of
22 them, and he certainly would have qualified for
23 that.

24 (Discussion off the record.)

25

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1 BY MS. DELGADO:

2 Q Circling back to an earlier -- so --
3 sorry. I just want to be done. So no other names
4 you can think of, correct, so we can move on from
5 this topic?

6 A I just haven't thought about this in a
7 very long time.

8 Q Okay. No, fair enough. I know -- it's
9 okay. It's what you can think of.

10 Let's see.

11 You mentioned earlier that you said,
12 I'm not interested in press or comms. I want a
13 policy job.

14 Do you know why I was slated for a
15 press job?

16 A Slated for one?

17 Q Well, put in the org chart for a press job
18 in particular?

19 A I don't know because it's -- Sean Spicer
20 must have put you there, but I'm going to presume
21 because you -- you wanted one and did well in the
22 campaign.

23 Q And are you aware of any e-mail or
24 statement I made where I said I want to be in the
25 press shop?

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1 **A** It's possible you said that to me. I
2 wouldn't know. I can't access those e-mails. It's
3 possible, but I don't recall that.

4 **Q** Is there any reason why I wouldn't have
5 been considered for a policy role given my
6 background writing about policy?

7 **A** I don't know is the easy answer, and
8 the -- but remember, you're somebody who went on TV.
9 Once you go on TV, people are going to see you as a
10 press person in the world of Trump. That's just a
11 fact.

12 So I don't know the specific answer;
13 but I'm telling you, generally, the way this goes,
14 which is why I specifically said I wanted a policy
15 job.

16 **Q** And to clarify, is it -- are you seen as
17 comms or press?

18 **A** You?

19 **Q** Yes, a person who goes on TV. Isn't that
20 comms?

21 **A** No. I think that President Trump would
22 see that as press because that's who you're facing
23 and that's who you're talking to, like an anchor or
24 a reporter.

25 Comms, to me -- and this didn't

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1 always work this way; but what it should be is press
2 is dealing with what happened a moment ago, an hour
3 from now, a day from here. Comms is peeking around
4 corners and organizing longer-term, public-facing
5 communications.

6 To explain, this is why the -- this
7 is the trade deal, this is the foreign trip, this is
8 the President visiting Michigan and Wisconsin today.
9 It's a little bit more take the policy; take the
10 legislation, the executive order, or just a speech
11 and figure out how to communicate that with the
12 public. I think comms is more for the public and
13 press is more for the -- it is for the public, but
14 through actual members of the working press.

15 Those two melded together a lot in
16 the Trump White House, but they're often separate.

17 Q Okay. Let's see. Sorry, I just always
18 wondered about that. It was just a curiosity of
19 mine.

20 Okay. Is there any -- do you have
21 any reason to think that -- why I -- notwithstanding
22 what you just said, why I would have been limited to
23 press or comms given, for instance, Omarosa, who
24 also went on TV in -- advocating for Trump role, was
25 placed in a coalitions role in the White House. Why

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1 would I have been limited to your only shot at a
2 White House job is in press or comms?

3 A You're saying things that I know nothing
4 about. I don't think I can --

5 (Simultaneous speakers.)

6 A I don't know -- I'm not aware of anybody
7 limiting you. And, you know, for the record, people
8 think the press and comms jobs in the White House
9 are glorious. They cannot believe I said no to
10 press secretary 48 minutes after President Trump was
11 elected. They can't believe it. Like, who would
12 give that up?

13 I don't even know what a -- he said,
14 You'll be great at that -- I wrote about it in my
15 book. You would be great at that, and I'm thinking
16 I'd be terrible at that. I'm not even sure what a
17 press secretary does. I'm actually still not sure
18 completely.

19 And so I would've been terrible at
20 that. I would've been terr- -- you know, I didn't
21 want the comms. But I don't look at them as
22 limiting at all. These are some dream jobs. So I
23 disagree with the premise. I don't think they're
24 limiting at all.

25 And frankly, I believe that Omarosa's

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1 title was either public affairs or communications
2 director or something at the Office of Public
3 Liaison, so she -- she seemed to have a comms job
4 within the Office of Public Liaison, which is less
5 coalition, respectfully -- I worked there -- and
6 more organizing, like, the events, people coming to
7 the White House from the public, the Easter Egg Roll
8 or the -- the Angel moms and dads whose -- whose
9 children have been killed by illegal immigrants,
10 that -- the OPL would be in charge of that, for
11 example. So...

12 But I believe she had a comms job
13 within that structure. I don't know because she,
14 like many, many others, w gone within the first 6 to
15 12 months.

16 BY MS. DELGADO:

17 Q So there are comms jobs outside of the
18 press shop and the comms shop?

19 A Very few in the White House. Many in the
20 administration. And they're --

21 Q And --

22 A Yeah.

23 Q Do you have any reason or do you have --
24 again, if your answer is I don't -- I never had any
25 information, that's fine.

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1 Did you ever hear any information or
2 reason as to why I wasn't given any role anywhere in
3 the administration?

4 A No. And I didn't know what you were
5 offered or not offered. I heard -- I thought I
6 heard you were going to work at the RNC. Is that
7 not right? Or that you had contact with the RNC?

8 Q First time I've ever heard that.

9 A That's what I recall, some -- for some
10 reason. But you're saying it was America First, so
11 maybe that's -- maybe I'm conflating the two.

12 Q Yeah, that was a year later.

13 A I -- I knew that you were offered a job
14 and, perhaps, took a position for compensation that
15 was connected to President Trump in some form or
16 fashion, meaning an outside PAC or the RNC or some
17 other group.

18 Q Yes, a year later, in 2018 -- or a year
19 and a month.

20 Okay. Let's see here. We'll do some
21 more exhibits since I have now opened the share
22 screen. See if I can...

23 MS. DELGADO: I'm sorry. Bear with me,
24 all.

25 Okay. Share screen again.

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1 BY MS. DELGADO:

2 Q Kellyanne, earlier, you said that you
3 don't recall Mr. Trump expressing any position or
4 viewpoint on the issue of my pregnancy and my
5 raising discrimination concerns on Twitter.

6 I wanted to show you this e-mail, and
7 it's an e-mail sent from Josh Dawsey, who was at the
8 time a reporter at Politico. He's now at the
9 Washington Post. And it's in the throws of when I
10 raised my concerns publicly.

11 Wanted to point you to the area
12 that's highlighted. If you could please read that.
13 In the meantime, I'll read it aloud into the record.

14 It says, quote, Trump became aware of
15 the issue. Trump was not happy, didn't want either
16 of them brought on, Jason Miller or AJ. Unquote.

17 Do you see that?

18 A Yes. I'm reading all of it.

19 Q Okay. Let me know when you're done.

20 A Well, I see a reporter characterizing how
21 you feel, how Trump feels, how Jason feels. I mean,
22 that's what reporters do, but they don't -- there
23 would be no way for them to know that.

24 I mean, it says here that you're
25 threatening people. You know -- you're furious,

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1 **you're threatening people. I mean, I don't --**
2 **doesn't seem very nice.**

3 Q Correct. I'm not representing -- to be
4 clear, I'm not representing whoever this person's
5 source was. For all we know, it's this Miller or
6 Miller's wife. I'm not saying this is accurate.
7 I'm just --

8 A **Yeah. No, no. I understand.**

9 Q Right. I'm just -- this is -- this was
10 relayed to me. And given what was relayed regarding
11 Mr. Trump, in particular, do you have any reason --
12 does that help refresh your recollection of whether
13 Mr. Trump did, in fact, say anything?

14 A **He never said anything to me about I don't**
15 **want either AJ or Jason around. He never said that**
16 **to me. I know he was made aware of your pregnancy.**
17 **And the first time it was presented to me was not**
18 **through an e-mail because it says you fired off**
19 **e-mails to me.**

20 I think we've discussed this before
21 because a different reporter -- a female reporter
22 from a different outlet asked me, said, Well, AJ
23 says that she told you. And I said, I -- I never
24 knew until I heard it at Mar-a-Lago after we got
25 back from Mobile, I think. They were on the plane,

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1 and I'm just confused.

2 All because you were there; and then,
3 all of a sudden, you left. And they said -- we
4 said, Well, she lives in Miami. She went home. And
5 I said, Okay.

6 And then I heard that you, quote, may
7 be pregnant. I never heard that you were.
8 President Trump never would have said to me -- never
9 did say to me that he didn't want either of you
10 there. I think that the situation got immediately
11 uncomfortable, untenable for Mr. Miller, whose wife
12 was also pregnant and who had accepted White House
13 communications director.

14 So -- by the way, the things in here,
15 I never knew. I never knew that you had a
16 relationship with Mr. Miller. I knew he was missing
17 the night before the debate in Las Vegas, but I
18 didn't know why. I knew he was married with a child
19 and I guess another on the way.

20 So I didn't know until -- I didn't
21 know. He did not -- did not say at Mar-a-Lago. I
22 don't recall that. Went to Miami with you, I didn't
23 know that. So --

24 Q No, I'm not representing the e-mail is
25 accurate. Again, much of it is inaccurate. I was

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1 just asking, given that this was represented to me
2 regarding Mr. Trump, if that seems correct to you.
3 Just that particular issue. Much of that e-mail
4 is --

5 **A No.**

6 Q Okay.

7 **A No.**

8 Q When you say --

9 **A And he would never say didn't want either**
10 **brought -- brought on, Jason Miller or AJ. No. I**
11 **mean, he never said that to me.**

12 Q Okay. When you say that Mr. Miller's
13 position was untenable because he was married with a
14 child on the way, to be sure, though, Mr. Miller was
15 aware that he was married with a child on the way
16 when he accepted the White House communications
17 director job and allowed it to be announced,
18 correct?

19 **A I guess.**

20 Q I mean, he -- he would know his wife is
21 pregnant, correct?

22 **A Correct. Yes.**

23 Q And he would know he was having some sort
24 of involvement, whether consensual or not, with me
25 at the time, correct?

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1 **A** Well, I can't answer a question where
2 you're suggesting that your relationship with him
3 was not consensual.

4 **Q** Well, he would know there -- right. Fair
5 enough.

6 He would know there was an
7 involvement with me that he himself is having,
8 correct?

9 **A** Yes.

10 **Q** Right.

11 So it wasn't anything that occurred
12 after that that made it untenable for him. The
13 circumstances you mentioned, the fact that he's
14 married and there is a situation were factors known
15 to Mr. Miller at the time he accepted the role.

16 **A** Now you're asking me to be in Mr. Miller's
17 head. I can't do that. I -- I only know what
18 happened, which is that he was married to Kelly,
19 they had a daughter, they had another child on the
20 way that ended up being a daughter. God bless them
21 all. I may have known that at the time. I may not
22 have.

23 And then, I learned later, in
24 December, that he had had a relationship with you
25 during the campaign. I never knew that. Other

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1 people knew that. They thought, you know, Oh, you
2 didn't know that? Well, how would I know that?

3 I was running the campaign. We were
4 losing to -- there was one national poll in all of
5 2016 saying Trump was beating Hilary. Like, I was a
6 little busy, and I wasn't monitoring people's
7 relationships.

8 And then I heard that you may be
9 pregnant with Mr. Miller's baby; and I said, Oh,
10 when did that happen? You know, I seem like the
11 last to know. And then it was confirmed that you
12 were, and I --

13 (Simultaneous speakers.)

14 BY MS. DELGADO:

15 Q Sorry, when -- when did it go from AJ may
16 be pregnant to it's confirmed that she is?

17 A I think people heard that you were or may
18 have been, and that's the way it was presented to
19 me. And then I said, Well, I was just with her. I
20 had no idea -- I don't think I knew that you were
21 pregnant we were on the plane to Mobile.

22 I remember you being on that trip and
23 I remember you not getting off the plane because
24 Mr. -- President-elect Mr. Trump came back and said,
25 What did you think of that? And you said, I didn't

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1 get off the plane. And he said, Are you okay? Or
2 something like that. And he looked at the rest of
3 us, and that was that.

4 As I recall, Mobile was the final
5 stop in his Thank You tour, and we flew from Mobile
6 to Mar-a-Lago. That, I remember specifically.
7 Because that was an event where he called Hope Hicks
8 and me up on the stage to speak to the crowd. So I
9 remember it very well.

10 Q Correct.

11 A Yeah.

12 I think Mr. Bossie was on the plane,
13 you and Mr. Miller. But...

14 I was very surprised to hear you were
15 having a relationship, let alone expecting a child
16 together. That did surprise -- I have -- I have
17 very thick shock absorbers. All of that surprised
18 me.

19 Q Okay. Let me bring up another exhibit.

20 So you became aware when you were at
21 Mar-a-Lago, you said?

22 A Yes.

23 Q And that was -- what's the time frame on
24 that, roughly?

25 A It may have the day -- the night of the

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1 day we were in Mobile, but it may have been the next
2 day. It was around that period. I was going back
3 and forth to Mar-a-Lago for transition to help with
4 the inaugural address, to -- to work on transition.

5 And we had meetings with, as I
6 recall, veterans, vet- -- veterans representatives,
7 and healthcare executives, and, you know, just
8 trying to work on policy ahead of the -- ahead of
9 time.

10 And I just -- I don't know who was
11 there. I know Bannon was definitely there. Might
12 have been Reince, might have been Spicer. It was
13 definitely Bannon.

14 I said, What are you talking about?
15 I mean, I was very surprised. So...

16 Q Yeah, I'm just trying to ascertain what
17 you meant when you said that, When this came to
18 light, the situation became untenable for
19 Mr. Miller.

20 A I -- I presume that he believed that and
21 he took himself out of the running for -- he -- he
22 withdrew from being director of communications. I
23 probably shouldn't say what he must have felt. I
24 probably shouldn't use the word untenable.

25 It seemed that it became untenable

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1 **for him, and so --**

2 Q Right.

3 **A -- he withdrew.**

4 Q Fair enough.

5 So -- but you're not saying that
6 Mr. Miller became aware that I was pregnant at that
7 time.

8 **A Oh, no. No, no, no. Not at all.**

9 **I think --**

10 Q So you can see from --

11 **A I became aware --**

12 Q Oh. Fair enough.

13 You can see from a reasonable
14 standpoint Mr. Miller was aware I was -- would have
15 naturally been aware that I was pregnant at the time
16 he accepted the role.

17 **A I don't know that. You would know that.**
18 **I don't know that.**

19 Q And that's -- fair enough. That's not
20 anything you need to answer.

21 THE STENOGRAPHER: AJ, did you want to
22 make that e-mail that you just took down
23 Number 2?

24 MS. DELGADO: Yes, please. Yes.

25 THE STENOGRAPHER: Got it.

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1 MS. DELGADO: Thank you.

2 (Exhibit 2 was marked for
3 identification)

4 MS. DELGADO: Okay. Let me put another
5 one on the screen.

6 BY MS. DELGADO:

7 Q Kellyanne, I'm showing you here an e-mail.
8 And I'm just going to scroll down so you can see
9 what I'm putting up in full.

10 It's an e-mail from me to you and
11 Steve. And just to keep things moving along, feel
12 free to -- if you want to scroll through the whole
13 thing. But the only reason I'm bringing it up is I
14 want to highlight this for you, if you can see,
15 which is --

16 MR. FLOOD: Ms. Delgado, I'm sorry to
17 interrupt. Can you show the very top of the
18 e-mail to me, like the --

19 MS. DELGADO: Of course, yes.

20 So I'm marking this -- would this be
21 Exhibit 3?

22 THE STENOGRAPHER: Yes, this will be 3.

23 (Exhibit 3 was marked for
24 identification)

25

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1 BY MS. DELGADO:

2 Q So it's an e-mail. You respond,
3 Kellyanne, on Wednesday, December 21st.

4 A Uh-huh.

5 Q Time, if you can all see, at 11:35 a.m.
6 So you received the e-mail. You responded.

7 I'm concerned about information
8 that's being sent to a reporter. You say you
9 don't -- you would never forward anything to a
10 reporter, et cetera.

11 What I want to highlight is -- what I
12 have written to you is the -- the third paragraph
13 down says, quote, Please be advised that I'm two
14 months pregnant, unquote.

15 Is that when you found out I was
16 pregnant, Kellyanne?

17 A From you, yes. I guess -- I guess that is
18 the first time. I certainly didn't know it when we
19 were in Mobile. That's my point. Which, I believe
20 was December 17, days before this.

21 Q Sure.

22 A And the very next day -- what I'm working
23 on on December 21st is, the very next morning at
24 6:00 a.m., President-elect Trump put out a statement
25 to the world that I was coming into the White House

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1 as counsel to the President and I was doing the
2 media rounds.

3 So I don't -- when I say I don't even
4 know what this is about, I don't -- that's an
5 e-mail. I'll say it under oath. I don't even know
6 what it was about. I don't know anything about who
7 breached NDAs, who's talking to what reporter,
8 who -- you know, this glaring double standard you're
9 mentioning.

10 The bottom -- please be advised, I'm
11 over two months -- over two months pregnant. Team
12 refuse to do anything to stop this abuse?

13 Again, I don't know -- when you say,
14 "I've been asking you this for days," had you asked
15 me? Am I one of the people in this quote, team that
16 you asked to stop this, quote, abuse? Because I'm
17 saying to you I don't even know what this is about.
18 And I'm --

19 Q No --

20 (Simultaneous speakers.)

21 BY MS. DELGADO:

22 Q Sure. I'll answer the question.

23 No. That's not what that e-mail is
24 stating, that you -- it's certainly not accusing you
25 of not handling an issue. It's speaking of the team

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1 in general. I'm merely pointing out you received
2 this e-mail, correct? And so I'm asking you if this
3 is the time that you became aware that I was
4 pregnant.

5 **A It certainly looks that way based on my**
6 **response. I don't even know what this is about.**

7 **Q Okay.**

8 **A And by the way, I don't -- did you even**
9 **say in here with whom you were pregnant? Did I even**
10 **know that in this e-mail?**

11 **Q Feel free to tell me.**

12 (Simultaneous Speakers.)

13 **A What?**

14 BY MS. DELGADO:

15 **Q Feel free to tell us if --**

16 **A No. I wouldn't have known. I don't see**
17 **his name here.**

18 **So I -- I may have known you were**
19 **pregnant, but I also didn't know who you were**
20 **dating. So I...**

21 **Q So when did you --**

22 (Simultaneous speakers.)

23 BY MS. DELGADO:

24 **Q Okay. Sure.**

25 **A That must have been --**

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1 Q When did --

2 A That must have been after this. That must
3 have been after this, and then we were at Mar-a-Lago
4 one more time. Not -- I don't believe I would have
5 gone -- I definitely didn't go to Mar-a-Lago between
6 this date, the announcement of me being counsel to
7 the President on the 22nd, and those -- the
8 reporters who apparently are spending their
9 Christmas Eve that way.

10 I would not have been at Mar-a-Lago
11 Christmastime with a 7-year-old, an 8-year-old,
12 12-year-old, and a 12-year-old. So the next time I
13 went to Mar-a-Lago would have been right before New
14 Year's, the following week.

15 So this must have been -- I didn't
16 know you were pregnant, and I certainly didn't know
17 by way of this e-mail with -- with whom you were
18 pregnant. I would have thought it was none of my
19 business unless you wanted to tell me -- I'm very
20 careful as a -- you know, as a supervisor, too, to
21 not -- to let people know I care about them
22 personally, but I can't delve into their personal
23 lives.

24 And so I didn't -- if you were
25 pregnant, I don't know that in this e-mail I ever

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1 would have said, Oh, that must be with Jason Miller.

2 Q When did you find out it was with Jason
3 Miller?

4 A It had to be, again, in a conversation
5 after this with Bannon. I know he was there, and
6 I'm trying to remember who else was there.

7 I think they -- they probably
8 presumed I knew. I'm like, What do you mean, Jason
9 Miller? What do -- she said she's pregnant, but
10 I -- is she? And with -- who does she date? I
11 didn't know if you were married, to be honest with
12 you, when I saw that. I had no idea.

13 So, yeah. I must have found out
14 right after that that it was -- you know, the -- the
15 other circumstances.

16 Q Were you concerned, though, especially,
17 you know, with your background as an attorney, when
18 a staff member says, She is pregnant, regardless who
19 by, and that she's being subjected to abuse? Does
20 that set off an alarm?

21 (Simultaneous speakers.)

22 A I don't have a background as attorney.
23 I'm a fully recovered attorney. I don't -- I don't
24 practice law and haven't in a very long time and
25 don't plan to any time soon, respectfully, to those

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1 who do and who are on this call. Three of you.

2 Have at it.

3 But that's why I said I don't know
4 what this is about. I'm seeing words thrown around
5 like abuse and discrimination and glaring double
6 standard, and I'm seeing that in an e-mail. Not a
7 court document. Not an investigation. I'm seeing
8 e-mail. I don't -- when I say, "I don't know what
9 this is about, I don't know what this is about.
10 Who -- who abused you? Who have you told on the
11 team to step in?

12 So abuse is your characterization of
13 some situation of which I am completely unaware at
14 that moment. That's why I'm saying I don't know
15 what this is about.

16 BY MS. DELGADO:

17 Q So you receive an e-mail from a staff
18 member who says "she's two months pregnant" as being
19 subjected to abuse, but there was no action taken
20 in -- in response to that other than the response we
21 see? Was there any action taken?

22 A Well, what I -- what I read -- what I read
23 in this e-mail anyway is that the abuse refers to
24 reporters knowing you're pregnant. Is there some
25 other kind of abuse of which I'm aware? Because if

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1 it's outside the four walls of this e-mail, I'm not
2 going to know it.

3 I might have then gone to Bannon and
4 said, What is this about? What's going on? He's
5 like -- and he might have said, Miller. And I'm
6 like, What -- what do you mean "Miller"? Then I
7 find out paternity of your child; and I'm like, Oh.

8 But we also have legal counsel and HR
9 and -- and I -- what was I supposed to do about it?
10 People say stuff all day long. People say stuff
11 about me all day long. I'm supposed to believe it's
12 true or think it as merit or take action on it? I
13 mean...

14 I don't know.

15 Q So you --

16 (Simultaneous speakers.)

17 BY MS. DELGADO:

18 Q -- I was pregnant, is what you're saying?
19 Are you --

20 A Pardon?

21 Q You --

22 (Simultaneous speakers.)

23 A Honestly, I had no reason not to believe
24 you were pregnant, but it's very clear I was one of
25 the last to know that you were pregnant and that the

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1 father of your child is Jason Miller, the
2 communications director.

3 BY MS. DELGADO:

4 Q You were --

5 (Simultaneous speakers.)

6 A I definitely feel I didn't -- I was one of
7 the last to know.

8 Your e-mail as much admits that. You
9 got Corey in there and Hope, and I -- I don't know
10 what any of that is about.

11 Q You're saying you were the last to know
12 that I was pregnant?

13 A Feels that way, based on this e-mail.

14 Q This was actually the first person to
15 know. You and Steve were the first.

16 A Oh.

17 Q But -- okay.

18 A May -- may I ask you a question,
19 Ms. Delgado? Why in the world would you put it in a
20 e-mail and not just come to me? We always had a
21 face-to-face relationship. Just come to me and say,
22 I'm pregnant, and Jason Miller's the father and I --
23 I need help or so-and-so is talking me down or
24 they're leaking to the press or I'm confused or I --
25 why not do that?

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1 **Why put it in an e-mail? It's almost**
2 **like you're building a case that I don't see that**
3 **exists.**

4 Q Were you in the office at that time?

5 A **Yes. As I say, I was there preparing with**
6 **Mr. -- with the -- with the President-elect, what he**
7 **was going to say the next day about my position.**

8 And we were -- we were bracing -- we
9 were bracing Bannon, Reince, and Jared for the fact
10 that I was going to come in and have a very senior
11 role steps away from them. And when the President
12 said to them, she's going to be on the same -- same
13 platform as all of you, I remember specifically.
14 Vice President-elect was there too.

15 And I wrote in my book, the three of
16 them wanted to jump out the window, but who cares.

17 Q So your position is that I shouldn't have
18 put this in e-mail, that I should have found you
19 despite not knowing if you were even in New York at
20 that time.

21 Kellyanne, I think when I sent this
22 e-mail, I was not in New York; so how would I come
23 to you in person?

24 A **Well, just call me --**

25 MR. BLUMETTI: Objection -- object -- I

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1 object to the form of that.

2 MS. DELGADO: Okay. Let's --

3 **A Yes.**

4 MS. DELGADO: I'm happy to answer a
5 question posed by the witness. I'm not -- I'm
6 not strictly sticking to the, I should only be
7 the one posing questions. I'm happy to answer
8 her question if it helps clarify the deposition
9 for her.

10 And her question was, Why didn't you come
11 to me in person.

12 BY MS. DELGADO:

13 Q This e-mail was sent December 21st, at
14 which point I was in Miami. So the answer to your
15 question, Kellyanne, is we were not in the same
16 geographical location. And I never have had your
17 cell phone number.

18 **A Okay.**

19 Q So that's the answer.

20 (Simultaneous speakers.)

21 BY MS. DELGADO:

22 Q But thank you for asking. I'm happy to --

23 **A Sure.**

24 Q -- clarify any question you have.

25 So there was not an option to come to

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1 you in person.

2 (Simultaneous speakers.)

3 BY MS. DELGADO:

4 Q Let me point --

5 A It's fine. But -- but I think that it's
6 also just thrown in there, I'm actually two months
7 pregnant; and the whole thing is about a glaring
8 double standard and abuse.

9 And when I say, as I did immediately
10 to that e-mail, acknowledging it to you and copying
11 Steve Bannon since we were the two original
12 recipients, I have no idea what this is about, I had
13 no idea what you were talking about.

14 So Jason Miller, I -- I don't think
15 was, you know, confiding much in me about his
16 personal life.

17 Q Okay. So let's put up -- so that was
18 December 21st. Let me show you another -- I'm going
19 to mark this Exhibit 4.

20 (Exhibit 4 was marked for
21 identification)

22 BY MS. DELGADO:

23 Q This is an excerpt -- I'm happy to put up
24 the whole article if you'd like or share the link.

25 Okay. This is an excerpt, Kellyanne,

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1 of -- sorry. Are you able to see --

2 **A Yes, I'm...**

3 Q -- the article?

4 **A I'm squinting, yes. Let's see.**

5 **(Simultaneous speakers.)**

6 **A (Reading Sotto Voce).**

7 BY MS. DELGADO:

8 Q Feel free to take your time.

9 **A Okay? Wow.**

10 **Wait. Is it still there? Hold on.**

11 Q Take your time.

12 **A (Reading Sotto Voce).**

13 **Yes. Okay.**

14 Q Okay. So I -- from the earlier exhibit we
15 saw, I e-mailed you the morning of December 21st,
16 correct?

17 **A Yes.**

18 Q Okay. And the response was simply, I
19 don't know what this is about.

20 And you don't recall -- and I'm not
21 putting words in your mouth, so let me just reask.
22 Do you recall taking any action after receiving that
23 December 21st morning e-mail from me?

24 **A Taking action?**

25 Q In terms of -- let me qualify what I mean.

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1 I know that's a broad term.

2 Did you take any steps in terms of
3 calling me or calling HR or speaking to Steve
4 Bannon, anything in regards -- any action in regards
5 to the e-mail you had received?

6 **A It's possible I said to Bannon, What's**
7 **going on here? What is this about? Or asked Hope**
8 **or someone.**

9 But Bannon, I specifically remember
10 saying it's Miller. And I said, What is Miller? I
11 had no idea what was going on.

12 And by the way, respectfully, you're
13 showing me an article. I don't know the date. I
14 don't know the rest --

15 Q Yeah.

16 A -- of the context of the article.

17 Q Let --

18 (Simultaneous speakers.)

19 A I just -- this is enough for me to
20 remember -- this is enough for me to refresh my
21 recollection that, yes, I need to Twitter to
22 announce paternity. I do -- I do vaguely recall
23 that.

24 BY MS. DELGADO:

25 Q Yes.

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1 And just for the record, absolutely,
2 Kellyanne, I'm happy to state, this is from The
3 Daily Beast; and it is entitled, Why Did Trump Aide
4 Jason Miller Suddenly Quit?

5 **A Okay.**

6 Q Okay. And I was throwing --

7 (Simultaneous speakers.)

8 **A What's the date?**

9 BY MS. DELGADO:

10 Q -- because it's -- it's got a good summary
11 of the tweets and the dates. A relatively good
12 summary.

13 **A What's the date of the article?**

14 Q It was posted -- published December 25th,
15 2016 at 1:41 p.m.

16 **A 25th?**

17 Q December 25th.

18 **A Wow, these people really need to find
19 something to do on a national holiday.**

20 Okay. Great. Okay. I -- I doubt I
21 saw it on December 25th, but go ahead. But I am
22 vaguely aware of the --

23 Q Right.

24 (Simultaneous speakers.)

25 **A Yes.**

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1 BY MS. DELGADO:

2 Q Yeah. I don't mean to say to -- it simply
3 has a nice summary of the tweets, which you said you
4 didn't recall. So that's why --

5 A No, no. I do recall now -- I do recall
6 now you tweeting, yes. It is not my preferred form.
7 I mean, at the time, I had a husband who did not
8 tweet in all of 2016, so -- and I since have
9 discovered, you know, that Twitter -- some people
10 just want to be active on Twitter.

11 I think I -- I did know that you put
12 these tweets out there --

13 Q Okay.

14 A -- about -- and I -- what I would -- I
15 would characterize them as announcing paternity of
16 your child.

17 Q And it states that, On the afternoon of
18 the 22nd, Delgado tweeted, quote, Congratulations to
19 the baby-daddy on being named White House Comms
20 Director. Unquote.

21 A Yes.

22 Q So -- so at that point, surely, by then,
23 you were aware that it was Miller, correct?

24 A Oh. You're saying he was announced that
25 day?

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1 Q No. I'm speaking about my tweet saying he
2 was --

3 A No, no, no. I know. But when was he --
4 you're saying, Congratulations concerning the new
5 comms director tonight.

6 Are you saying...

7 Q Where's the word --

8 (Simultaneous speakers.)

9 A Oh, you're saying you're announcing
10 tonight.

11 Okay. When was he announced as comms
12 director?

13 BY MS. DELGADO:

14 Q I don't see the word "tonight." I want to
15 make sure you're reading the right thing.

16 A Yeah. It says, Later that evening,
17 Delgado tweeted, quote, So an announcement
18 forthcoming concerning the new comms director
19 @JasonMillerinDC tonight, at the bottom.

20 Q Right. I'm asking you to read -- to go in
21 order. It's "on the afternoon of the 22nd," just
22 above that. Says, On the afternoon --

23 A Okay.

24 Q -- of the 22nd. Okay.

25 A Okay.

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1 **Congratulations to the baby-daddy on**
2 **being named -- who had just won the position.**

3 **And I know the timing because they**
4 **had to wait for me to decide what I was doing. And**
5 **I called Miller and Spicer the day before -- or**
6 **maybe two days before probably, a few days before**
7 **that -- and said, I'm going to come in as counsel**
8 **for the President. I'm not going to put press or**
9 **comms in my title. I don't want to do that, but I**
10 **also want to give you latitude to do what you need**
11 **to do without me hovering over as press and comms.**

12 **I was very, very upfront about that.**

13 Q Okay.

14 A So I -- I recall speaking to both of them
15 **days before these announcements.**

16 **But this makes sense because the**
17 **President announced me at 6:00 a.m., and then**
18 **announced, I guess, Miller after that. So -- I see.**

19 Q Right.

20 **Miller's announcement was sometime, I**
21 **believe, around 1:00 p.m. or so?**

22 A **That makes sense. Yeah, that makes sense.**

23 Q So at this point, what I'm -- what I'm
24 asking is, at this point of the afternoon of the
25 22nd, naturally, at this point, you're aware that

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1 the pregnancy is from Miller; is that correct?

2 **A** I'm aware -- I think I'm aware possibly
3 through your tweets, possibly -- I don't know. I
4 don't know how I was aware, but it all happened very
5 quickly.

6 I was not aware when I e-mailed you
7 back on December 21st. I have no idea what this was
8 about. I definitely was not aware then.

9 **Q** Sure.

10 So from this point on, you and
11 possibly others were now clear on who the
12 pregnancy --

13 **A** I think --

14 (Simultaneous speakers.)

15 **A** I think your intention was that we all
16 know, the whole world, so that mission accomplished
17 I think on part of the whole world and we all knew
18 by way of your tweets.

19 BY MS. DELGADO:

20 **Q** And your -- you describe it as though I
21 want the whole world to know that I'm pregnant or --
22 that's your interpretation of the tweet?

23 **A** No. I interpreted the tweet as you want
24 everybody to know that you're pregnant with Jason
25 Miller's child. Who's Jason Miller? He, according

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1 to you, was just named White House Communications
2 Director. He's the, quote, John Edwards of 2016.

3 Yeah. I don't see you saying
4 anywhere you're being abused on your tweets; but in
5 any event, yes, I -- I can read them for what they
6 are. And I know who John Edwards is.

7 Q So over a day before I posted that, I did
8 contact you, correct?

9 A Yes. You talked about a -- many other
10 people in the e-mail. I couldn't even see the
11 entire e-mail. You only showed me an excerpt. And
12 my response to you was, I don't even know what this
13 is about.

14 Q Okay.

15 A And then whatever else I said. So sure.

16 Q Okay.

17 A I think you suggest -- your suggestion is
18 that you're allowed to be in Miami unavailable to
19 come to someone, I guess you trust. I certainly
20 wasn't your boss. And you're allowed to be
21 unavailable; but somehow I -- who, on December 21st,
22 was in a law firm about to sign a multi-gazillion
23 dollar deal to sell my company to a major company
24 and not go in the White House, instead agreed that
25 day with Mr. Trump that he'd announce the next day I

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1 was coming as counsel to the President. You're
2 suggesting I should have been more focused on your
3 e-mail than my career and my family moving to
4 Washington? Not going to happen.

5 Q Okay. I'm going to move to strike that as
6 nonresponsive. That's not remotely what was
7 asked --

8 (Simultaneous speakers.)

9 A It's very responsive. You're asking
10 questions about intent and action and why I did this
11 and why I didn't do that, so it's very relevant for
12 me to tell you what I was doing that day.

13 MS. DELGADO: Can the court reporter read
14 back the question I asked?

15 *(Discussion off the record.)*

16 *(Requested portion read back.)*

17 MS. DELGADO: Right.

18 So again, I'm going to move to strike the
19 rest as nonresponsive.

20 Okay.

21 THE STENOGRAPHER: Can we take a quick
22 five?

23 MS. DELGADO: Sure.

24 THE STENOGRAPHER: Thank you. I
25 appreciate it. I'll be back shortly.

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1 MS. DELGADO: Okay. So back at -- okay.
2 Five minutes.

3 THE STENOGRAPHER: Off the record. Back
4 at 11:50?

5 MS. DELGADO: Sure.

6 THE WITNESS: Thank you.

7 (Recess.)

8 THE STENOGRAPHER: And we are back on the
9 record.

10 BY MS. DELGADO:

11 Q Kellyanne, I'm going to try to get through
12 the rest as quickly as possible.

13 A Thank you.

14 Q You have my word on that. Don't worry.

15 Oh, quick question. Just for the
16 record, during the break, you didn't discuss your
17 testimony with your counsel; is that correct?

18 A I did not.

19 Q And I should have asked this earlier at
20 the beginning. Did you meet with or chat with
21 Mr. Blumetti, the Trump campaign counsel, at any
22 point prior to today?

23 A About this, no.

24 Q Okay. Thank you.

25 Okay. So let's get these exhibits

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1 ready. I'm going to share the screen again.

2 THE STENOGRAPHER: This will be Number 5.

3 MS. DELGADO: Okay.

4 (Exhibit 5 was marked for
5 identification)

6 MS. DELGADO: Is everyone able to see?

7 It's a two-page PDF. I'm going to mark as
8 Exhibit 5.

9 BY MS. DELGADO:

10 Q Kellyanne, if you --

11 THE STENOGRAPHER: Yes, we can see it.

12 MS. DELGADO: Okay.

13 BY MS. DELGADO:

14 Q These are three headlines. At the top is
15 a headline that reads, Kellyanne Conway Says Trump
16 Officials Wouldn't Want Their Wives Working in the
17 White House, December 9th, 2016. It's an article
18 from Time.

19 The second is a head -- sorry. The
20 second is a headline from the cut; and it's, quote,
21 Kellyanne Conway Suggests Mothers Shouldn't Take
22 Jobs in the White House.

23 A I'm sorry. It's like -- it's like reading
24 a comedy.

25 (Simultaneous speakers.)

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1 **A** Was this the -- was this the nine -- was
2 the this adorable 19-year-old -- no, can you go up
3 so I can see the byline?

4 BY MS. DELGADO:

5 **Q** Sure. Sorry. I will --

6 (Simultaneous speakers.)

7 **A** No, no, no, no, no. No, it's important
8 because one of them was a 19-year-old intern, I'm
9 sure who's at UCLA protesting today.

10 BY MS. DELGADO:

11 **Q** Her name's Samantha Cooney. I don't know
12 if she's 19 or not, Kellyanne.

13 **A** No, not her, but one of the people who
14 wrote was.

15 Yes. I've seen these headlines. I
16 don't write the headlines for left-wing rags that
17 never saw us coming and have been upset ever since.

18 **Q** Okay. If I could just finish reading into
19 the record.

20 The next headline is from The Cut.
21 It's December 8, 2016: Quote, Kellyanne Conway
22 Suggests Mothers Shouldn't Take Jobs in the White
23 House.

24 And then, the third and final one is
25 a Washington Post op-ed, December 8th, 2016: Quote,

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1 What Kellyanne Conway gets right (and wrong) about
2 moms and work.

3 These are referencing what I'll mark
4 as exhibit --

5 MS. DELGADO: What's the next one,
6 Exhibit 6?

7 THE STENOGRAPHER: The next one -- yeah,
8 that was 5. The next one will be 6.

9 (Exhibit 6 was marked for
10 identification)

11 BY MS. DELGADO:

12 Q Kellyanne, I'm going to throw up on the
13 screen. This is from Politico, December 9th, 2016.
14 And it's an actual transcript, out of fairness,
15 regarding the remarks you made about which we saw
16 those earlier headlines. And they were remarks you
17 made at a, quote, Women Rule Summit in D.C. on
18 December 7.

19 And so I wanted to just scroll
20 through that and give you a chance if -- and I can
21 scroll through it as slowly as you'd like -- to read
22 over them and let me know of anything you recall as
23 you're being misquoted or this seems like an
24 accurate transcript to you.

25 So just let me know what page you'd

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1 like me to start on and how slowly you want me to
2 scroll.

3 **A Where is it?**

4 Q So let me share -- sorry. Let me share
5 it. Thank you. It might be helpful to put it up.

6 Okay. Do you see it now?

7 **A Uh-huh. I see some other headlines.**

8 **So far, four left-wing organizations**
9 **characterizing my thoughts.**

10 Oh, I think one of -- one of whom
11 **actually has children, but go ahead.**

12 Q Do -- do you see -- I'm just making sure
13 that the right one --

14 **A All I see is a picture of me right now.**
15 **Yes, that's all I see is a picture of me.**

16 Q Perfect.

17 So Politico actually provided the
18 transcript --

19 **A Okay. Keep going, please.**

20 Q -- of the remarks. So I want to make
21 sure -- these are your remarks. It's not -- it's
22 just straight a transcript of your remarks. It's
23 not anything editorialized.

24 So I'm just going to scroll through
25 it; and if you see anything that seems like it's a

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1 made-up quote --

2 (Simultaneous speakers.)

3 **A Great. Keep going. Why don't you get to**
4 **the -- why don't you get to the part that you're**
5 **trying to use to prove a point that's not true so**
6 **that we can just expedite? I know what I said.**

7 BY MS. DELGADO:

8 Q Okay. I'm going to strike that as
9 nonresponsive. There wasn't a question posed and
10 unduly argumentative.

11 (Simultaneous speakers.)

12 **A (Reading Sotto Voce).**

13 BY MS. DELGADO:

14 Q -- point here.

15 (Simultaneous speakers.)

16 **A Okay. So -- okay. So this is what I'm**
17 **reading -- this is what I'm reading as you scroll.**
18 **This is what I'm reading as you scroll.**

19 Quote -- since we're going to quote
20 me from that day. Quote, Kellyanne Conway, quote,
21 Donald Trump has always had women around him in
22 powerful positions. That's true in his corporation,
23 in his campaign, and now his cabinet. He just has
24 always elevated women to the highest echelons. I
25 know the women in the Trump Corporation, have gotten

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1 to know them very well recently. Obviously, let the
2 record reflect it was Donald J. Trump who elevated
3 the first female in Republican presidential politics
4 to that role, and now -- and then, albeit
5 successfully, owing in large part, if not most part,
6 to him, and the campaign that he stewarded. And
7 that he's doing it in his cabinet.

8 And I talked all about -- we can go
9 on and on because it's pretty amazing -- about me
10 being the first woman presidential campaign manager
11 for any Republican nominee in history, let alone a
12 winning one for either Republican or Democrat.

13 So I think this entire excerpt that
14 you wanted me to read is a great trip down memory
15 lane of the facts that President Trump has always
16 elevated women to powers of position.

17 You're going too fast.

18 BY MS. DELGADO:

19 Q Oh. No --

20 (Simultaneous speakers.)

21 A So then she asked -- then she asks a
22 question -- then she asks a question: Palmer:
23 There's been a lot of speculation, what role you
24 play in the White House. You tweeted --

25 THE STENOGRAPHER: All right. Ms. Conway,

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1 can you slow down just a little bit? You're
2 reading really fast.

3 THE WITNESS: Sure.

4 THE STENOGRAPHER: Thank you.

5 THE WITNESS: Sure.

6 A So this reflects what I wanted to do at
7 the time, which is the Plouffe -- David Plouffe
8 role. I'm referring to David Plouffe.

9 I wanted the role to build a
10 political superstructure on the outside. And when
11 President Obama was elected, David Axelrod, one of
12 his campaign managers went inside the White House;
13 David Plouffe, another campaign manager stayed
14 outside. I wanted the Plouffe role, and I repeat
15 that here.

16 Mom of four is not in most job
17 descriptions. That was me chuckling, and then I go
18 on to say, My children are 12, 12, 8, and 7, which
19 is bad idea, bad idea, bad idea, bad idea for mom
20 going inside.

21 Yeah. That's my personal belief for
22 my family.

23 Yes. I told them mommy is on her
24 semester abroad, which is still going on apparently.

25 Keep going. Yes, I'm very funny.

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1 Keep going.

2 You're a super senior.

3 I went from -- (Reading Sotto Voce).

4 Yeah, that's me laughing about that,
5 and so...

6 Okay. But they have to come first.
7 Those are very fraught ages. Terms of going to the
8 West Wing. I'll do whatever, so I'm not worried
9 about it. It's called The Kellyanne Role. Which,
10 again, is a woman being elevated to a position of
11 power.

12 And so Trump said recently. I fully
13 support their administration. They're going to do a
14 lot of great things. Divided government.
15 Opportunity...

16 I think the lesson also is all the
17 opportunities out there for women, increasingly in
18 politics and media and public policy and government
19 affairs, all the things we do in Washington and when
20 I was discussing my role.

21 Yes. And then I was really referring
22 to a meeting I was having with Reince and Bannon
23 when I said I was discussing the senior people, I
24 have four kids. They said, I know you have four
25 kids, but.

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1 And I said, What can come after the
2 but?

3 What are we cutting out... (Reading
4 Sotto Voce).

5 And here I --

6 BY MS. DELGADO:

7 Q Am I scrolling too fast?

8 A No, no, no.

9 (Simultaneous speakers.)

10 A It's actually -- this is great. I'm just
11 surprised that you would want me read it, but here
12 goes.

13 It says, Well, not -- so you -- so
14 let the record reflect you have presented me with
15 five documents. This is an exhibit. But you just
16 showed me a two -- quote, two-minute read from some
17 clickbait thing from Time; something from The Cut,
18 which is anti-Trump; something from the Washington
19 Post, which is anti-Trump, all of which suggested
20 Kellyanne Conway somehow said women shouldn't work
21 in the White House.

22 When we read what Kellyanne Conway
23 said -- I just read some of it into the record, and
24 I'll continue to go.

25 Conway, quote, Well, first of all,

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1 mothers and unmarried women and married women,
2 they're all welcome in the Trump White House. And
3 he's made that very clear to me. He's been nothing
4 but gracious, and a gentleman and a wonderful mentor
5 and boss to me, and to other women. So that's all,
6 that all would be a personal choice, not a demand on
7 me.

8 BY MS. DELGADO:

9 Q Okay. Scroll down a little bit more?
10 I'm just asking you if any of this
11 seems inaccurate to -- if you spot any --

12 A No, it all seems -- no, it all seem --
13 it's very -- it's all accurate in terms of what --

14 Q Okay.

15 A -- I said and answering the questions with
16 my usual personal flourish and humor, which you
17 can't get from just reading a transcript.

18 But no, it's very accurate. All the
19 stuff I saw about President Trump welcoming mothers,
20 unmarried women, married women, all types of women
21 into the White House, that he's made that clear,
22 that is all a thousand percent true.

23 Q Okay. So can you give me an example of
24 anyone who was pregnant and entered the White House
25 in the incoming --

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1 (Simultaneous speakers)

2 **A I don't go around asking people if they're**
3 **pregnant. That's not my thing.**

4 BY MS. DELGADO:

5 **Q Sure. Fair enough.**

6 Do you know of anyone who was --
7 given that pregnancy's kind of a visual thing that
8 you can spot at a certain point without someone
9 telling you?

10 **A Well, I will say, respectfully,**
11 **Ms. Delgado, most people don't announce their**
12 **pregnancies on Twitter or paternity, so it is**
13 **unusual.**

14 In addition to you, I would say, did
15 I -- was anybody pregnant. I really don't know.
16 There were certainly people who had babies while
17 they were in the White House, certainly dads whose
18 wives were pregnant or girlfriends were pregnant.

19 Ivanka Trump had just had a son in, I
20 believe, March of that same year. Lara Trump had
21 both of her babies when we were in the White House.
22 So yeah, it's -- it's an ongoing thing.

23 I don't remember -- and again, I
24 don't police people's pregnancies. If they want to
25 tell us, I guess, personally or through Twitter or

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1 e-mail, they can. But I don't, you know...

2 But here, it says, First of all,
3 mothers. That means that you were pregnant before
4 and you since had the baby. And that was me. I had
5 four of them. Mothers, unmarried women, and married
6 women.

7 So they could be pregnant or not
8 pregnant, but I made very clear her a fact. And you
9 would not believe that this is what I had actually
10 said based on the headlines, which are clickbait.
11 I'm very well-aware that attaching my name to almost
12 any headline or byline gets these otherwise
13 underwhelming, inaccurate, and unknown reporters a
14 little bit of joy that day.

15 Q Okay. So the pregnant women that you cite
16 to as examples of pregnant who worked in the White
17 House while they were pregnant is Ivanka Trump and
18 Lara Trump --

19 (Simultaneous speakers.)

20 A No. I don't -- I don't know any -- I
21 did -- not saying that. I'm saying that -- first of
22 all, it's more -- first of all, it's more likely --

23 (Simultaneous Speakers.)

24 A -- it's more likely -- first of all,
25 everybody is in the White House -- excuse me.

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1 BY MS. DELGADO:

2 Q Kellyanne --

3 (Simultaneous speakers.)

4 BY MS. DELGADO:

5 Q I need --

6 (Simultaneous speakers.)

7 **A Well, I'm answering your question.**

8 BY MS. DELGADO:

9 Q Yeah. I'm not trying to interrupt you
10 whatsoever. I just need to get the whole question
11 in for the court reporter, and then you can take as
12 much time as you'd like to answer.

13 The question was: The pregnant women
14 that you know of, that you know of are -- which you
15 cited were Ivanka Trump in the White House and --
16 and Lara Trump, which I don't believe --

17 **A No.**

18 Q -- has worked in the White House.

19 **A No. No, no.**

20 Q Any others?

21 **A I was just making a point. I was making**
22 **the point. If you have a specific ques- -- you**
23 **already asked me the question. I answered it.**

24 Do I know anybody who was pregnant in
25 the White House. And I said, I don't know if people

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1 are pregnant or pregnant unless they tell us they're
2 pregnant. You chose to tell the world on Twitter
3 and to me in some e-mail as an aside, didn't even
4 sound like it was the most important part of your
5 e-mail. I had no idea what was going on.

6 But in the Politico Women Rule
7 Conference that you seem to want to quote and have
8 as exhibits here, so I will quote from them: Well,
9 first of all, mothers and unmarried women and
10 married women, they're all welcome in the Trump
11 White House.

12 By definition, mothers, who once were
13 pregnant are -- or are pregnant are welcome in the
14 Trump White House; unmarried women and married women
15 could be pregnant or not pregnant, could be moms or
16 not moms. So they're all included there.
17 Regardless of one's pregnancy status at any given
18 time.

19 Q Okay. I could either move to strike the
20 rest of that as nonresponsive past the first answer.
21 The ques- -- the first sentence.

22 The question was simply, Do you know
23 of any who were pregnant in the White House? Do
24 you?

25 A I don't recall. I don't recall who was

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1 **pregnant in the White House.**

2 Q So you can't give me a name of anyone that
3 you recall as being given --

4 (Simultaneous speakers.)

5 A Oh, yes, I can. Yes. Julie Ratcliffe had
6 a baby while we were in the White House, yes. Her
7 fourth.

8 BY MS. DELGADO:

9 Q What's the name?

10 A Julie Ratcliffe. She was Ivanka Trump's
11 chief of staff, a very busy person.

12 Q Was she pregnant at the time that the
13 offer was given, or was this somewhat well into the
14 administration? Do you know?

15 A Oh, now, that's a diff- -- so that's a
16 different question than you asked, correct?

17 Q No, I asked --

18 A You're asking a different question now.

19 Q Kellyanne, you're not --

20 (Simultaneous speakers.)

21 A You asked me, did I know -- did I know
22 any -- anybody was pregnant in the White House; and
23 I said, Yes, Julie Ratcliffe.

24 BY MS. DELGADO:

25 Q Right.

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1 And now I'm asking you a question
2 about Julie. Was she pregnant at the time she was
3 given the White House offer? Do you know? If you
4 know. If you don't, you don't know.

5 **A I don't think so.**

6 Q Fair enough.

7 **A She had a baby later.**

8 Q Okay. Fair enough.

9 And, Kellyanne, you made a remark a
10 few moments ago of, quote, Most women don't announce
11 their pregnancy on Twitter. Correct?

12 **A Well, I wouldn't know if people are**
13 **pregnant unless they, A, tell me or have told the**
14 **world. So the specific -- the factual answer to**
15 **your question, did I know anybody who was pregnant**
16 **going into the White House is no. I don't know**
17 **everybody -- I don't know who's pregnant and who's**
18 **not pregnant until they say that they're pregnant.**

19 So --

20 Q Right.

21 But you made a remark -- and I won't
22 pretend to describe whether it was snarky or not.
23 I'll let the remarks --

24 (Simultaneous speakers.)

25 **A It's not -- well, I can answer that under**

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1 **oath.**

2 **It wasn't snarky. But you're showing**
3 **headlines written by people --**

4 BY MS. DELGADO:

5 Q Kellyanne, let me finish --

6 (Simultaneous speakers.)

7 **A -- who are -- excuse me --**

8 (Simultaneous speakers.)

9 BY MS. DELGADO:

10 Q -- let me finish my question --

11 **A -- mischaracterize what I actually said in**
12 **this conference.**

13 Q I just need to finish the question, or the
14 court reporter's going to have a very difficult job
15 of transcribing this.

16 You stated earlier that most women
17 don't announce their pregnancy on Twitter.

18 Would you agree that most woman,
19 however, are not pregnant by a supervisor who has
20 just been appointed to a top role --

21 MR. BLUMETTI: Objection --

22 BY MS. DELGADO:

23 Q -- in the White House, despite the
24 employer being aware that he had impregnated a
25 subordinate?

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1 MR. BLUMETTI: Objection to form.

2 BY MS. DELGADO:

3 Q Okay. I'll qualify it.

4 Would you -- would you concede most
5 women are not pregnant by their supervisor who's
6 just been appointed to White House Comms Director?

7 MR. BLUMETTI: Objection to form.

8 **A Are most people -- same thing, yeah. Try**
9 **again.**

10 MS. DELGADO: Sorry. There was an
11 objection to form.

12 MR. FLOOD: Kellyanne, do your best to
13 answer the question. It's been objected to,
14 but you may answer.

15 MS. DELGADO: No, I'll -- I'll rephrase it
16 because I definitely want to get this on the
17 record.

18 BY MS. DELGADO:

19 Q Would you agree -- when you said that most
20 women don't announce their pregnancy on Twitter,
21 describing how I tweeted, would you agree, however,
22 that most women are not pregnant by their
23 supervisor?

24 MR. BLUMETTI: Same objection.

25 You can answer as far as I'm concerned.

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1 BY MS. DELGADO:

2 Q Yeah. That's fine.

3 A Yes, I would assume most people are not
4 pregnant by their supervisor, which has nothing to
5 do with when one announces their pregnancy and how.

6 Q Would you say there were special
7 circumstances here in that the supervisor had just
8 been given a promotion?

9 MR. BLUMETTI: Objection to form.

10 MR. FLOOD: Objection to form.

11 A I'm sorry. Ms. Delgado --

12 MS. DELGADO: I'll rephrase it.

13 (Simultaneous speakers.)

14 A Ms. Delgado, just so I understand -- I'm
15 sorry. I don't understand the intent of your
16 question. If you could help me with that.

17 Is the intent of your question to
18 justify the fact that you exposed and went after
19 Jason Miller on Twitter as the father of your child;
20 or is the intent of your question how factually
21 unusual it is or how infrequent it happens that
22 somebody who's taken a job as White House
23 Communications Director, which there have probably
24 been a couple dozen in the U.S. history, has
25 impregnated somebody who worked for him? I mean,

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1 **I'm not sure what you're asking me to answer.**

2 BY MS. DELGADO:

3 Q Kellyanne, I don't think the person taking
4 the deposition needs to answer the witness as to the
5 intent besides the -- behind the question.

6 The question is --

7 **A Oh, sure you do.**

8 (Simultaneous speakers.)

9 BY MS. DELGADO:

10 Q -- would you -- would you agree it's a
11 unique circumstance?

12 **A Yes, of course. Factually, it's a unique**
13 **circumstance because very few people have been**
14 **communications director in this country in our**
15 **history.**

16 Q And would you also --

17 (Simultaneous speakers.)

18 BY MS. DELGADO:

19 Q -- circumstance to be impregnated by a
20 supervisor?

21 MR. BLUMETTI: Object to form.

22 **A I certainly know people who have been**
23 **impregnated by their supervisor.**

24 BY MS. DELGADO:

25 Q Is it common?

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1 **A** I would think not. Fortunately, no. And
2 unfortunately, I wish it hadn't happened in the way
3 it did because I would have liked both of you to
4 have been working as hard as the rest of us the
5 night it did happen.

6 **Q** Do you -- that's an interesting point you
7 make.

8 So do you believe Jason Miller would
9 have permitted me to be in the White House pregnant
10 with his child and we would have both been able
11 to --

12 **A** I have no idea.

13 (Simultaneous speakers.)

14 **A** I have no idea. And it's not -- never
15 been suggested to me that he had any authority one
16 way or the other to make that decision.

17 BY MS. DELGADO:

18 **Q** Has it ever been suggested to you that he
19 didn't have the authority?

20 **A** He didn't have that authority. They were
21 waiting on me to decide if I wanted his job. So I
22 wouldn't say he had that kind of authority.

23 He couldn't be announced as
24 communications director until the person who was
25 offered it eight -- seven weeks earlier said no to

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1 **it. Me.**

2 Q You were saying Jason Miller would have no
3 authority even though he was announced as White
4 House Comms Director over who's in the comms shop?

5 **A You're saying after he was announced?**
6 **Because that was not clear in your previous**
7 **questions.**

8 Q At either --
9 (Simultaneous speakers.)

10 **A After he became comms director?**

11 BY MS. DELGADO:

12 Q At either point.

13 **A Could you give me a timeline because I**
14 **don't know the facts. If he was announced**
15 **communications director at roughly 1:00 p.m. Eastern**
16 **on December 22nd, when did he withdraw from that**
17 **position? What was that date?**

18 Q I'm sorry. I'm asking you, did Jason
19 Miller at any point, regardless of date, have
20 authority over who was in the comms shop?

21 **A I would think he did; but if he was comms**
22 **director for a day, the answer is probably no, it**
23 **wasn't real authority.**

24 **That's why I'm asking if somebody can**
25 **help me. I have a right to ask for the facts when**

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1 you ask me a question.

2 What day was he announced in
3 withdrawing his name from comms director? You
4 showed it before. You showed an article before that
5 he was leaving his job. What -- what date was that?

6 Q You're asking me for a fact, I don't know
7 as to when he entered a resignation or even asking
8 me for a fact. I don't know whether he resigned.

9 A No, no, no. Respectfully --
10 respectfully -- respectfully, you showed an article
11 earlier that said the real reason Jason Miller is
12 not coming to the White House. So if we can pull
13 that exhibit, we can get an idea of the date.

14 Q Sorry. You're asking what date he
15 announced that he --

16 (Simultaneous speakers.)

17 A What date -- what date was it announced
18 that he no longer would be going in as
19 communications director?

20 BY MS. DELGADO:

21 Q That's somewhere in the complaint. I
22 don't have that in front of me. I think it's
23 somewhere around Christmas -- maybe the day after
24 Christmas, I don't know.

25 A Okay. So you're suggest -- so you're

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1 telling me -- because this is important to my
2 answer, trying to piece all that together. And may
3 I state for the record and have it stricken that, as
4 a practicing Catholic with four children, 7, 8, 12,
5 and 12, including two Santa believers at the time, I
6 was a little busy around Christmas. I hosted for
7 the extended family, et cetera. So I, respectfully,
8 was not focused on your pregnancy or his paternity.

9 If he was announced on December 22nd
10 and, by December 25th or 26th, you are saying. So
11 I'll take your word, Ms. Delgado, that it was
12 announced he would no longer be communications
13 director --

14 MS. DELGADO: I'm going to strike all this
15 as nonresponsive.

16 BY MS. DELGADO:

17 Q Kellyanne, I don't --

18 A No, it is responsive.

19 (Simultaneous speakers.)

20 A No, no, no. You're not allowed --

21 (Simultaneous speakers.)

22 BY MS. DELGADO:

23 Q I don't know what question you're
24 responding to at this point. I don't know what
25 question you're responding to.

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1 I asked if Jason Miller had authority
2 over who was assigned to the comms role. Frankly,
3 that's already corroborated in documents, so we can
4 move on because I know you're on a time --

5 (Simultaneous speakers.)

6 **A No, we can't move on. We can't move on**
7 **because if he only had the position --**

8 (Simultaneous speakers.)

9 BY MS. DELGADO:

10 Q Well, I'm not here to answer questions,
11 and you're asking me questions. And respectfully,
12 you're here to answer questions under court order.

13 **A Yeah, but they have to be -- but they have**
14 **to be -- but they have to be good -- but they have**
15 **to be good questions, and they have to be questions**
16 **that I'm able to answer --**

17 THE STENOGRAPHER: Ladies.

18 **A -- that don't go on and on and on.**

19 BY MS. DELGADO:

20 Q Okay.

21 (Simultaneous speakers.)

22 **A So the answer -- the answer --**

23 THE STENOGRAPHER: I just want -- I'm
24 sorry --

25 **A -- to your question is this --**

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1 BY MS. DELGADO:

2 Q You -- okay. This is going --

3 (Simultaneous speakers.)

4 **A The answer to your question is this --**

5 BY MS. DELGADO:

6 Q Okay.

7 THE STENOGRAPHER: I'm sorry. Sorry,
8 ladies, ladies. Just so you know, especially
9 on Zoom, when you speak at the same time, it
10 cuts everybody off and it garbles, so I'm not
11 able to get or understand what's being said
12 when you're speaking at the same time. So it
13 will not appear on the record.

14 **A Then I'll answer the question.**

15 BY MS. DELGADO:

16 Q What -- the question was already asked.
17 You're clearly not answering it, so I'm going to
18 move on. It's not a particularly important question
19 because we already have documents to this effect.

20 **A No, I have a right to answer the question.**
21 **I have a right to answer the question.**

22 (Simultaneous speakers.)

23 **A I was involved in all this at the time.**

24 BY MS. DELGADO:

25 Q Sure. What -- what was the question

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1 you're answering?

2 **A Did have authority to decide who was in**
3 **the comms department.**

4 **Q** Sure. Do you want to answer that again?

5 **A Yes.**

6 **Q** Okay. Go ahead.

7 **A It's likely that he had authority to**
8 **decide who was in the comms department. However, he**
9 **was only White House Communications Director for**
10 **three or four days, two of which were Christmas Eve**
11 **and Christmas Day; so I doubt he had authority to**
12 **put anybody in place.**

13 **Q** So you're not aware that Mr. Miller was
14 putting together the comms department even prior to
15 his announcement?

16 **A I knew that --**

17 (Simultaneous speakers.)

18 **A I knew the -- I knew that Mr. Spicer was**
19 **doing it for the press and comms together. I sat**
20 **with him on the patio at Mar-a-Lago one day at**
21 **breakfast, and -- and he was discussing that.**

22 **I don't know that I ever had that**
23 **discussion with Mr. Miller that I can recall.**

24 BY MS. DELGADO:

25 **Q** I'm happy -- if you want to slow things

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1 down, I'm happy to show you e-mails --

2 **A No.**

3 (Simultaneous speakers.)

4 **A I don't need to see their e-mails.**

5 **They -- they didn't want me involved then, I don't**
6 **want to be involved now, believe me.**

7 BY MS. DELGADO:

8 Q Okay. Mr. Miller was putting together
9 comms org charts and lists, but your -- your answer,
10 it speaks for itself --

11 **A I understand.**

12 Q -- as it is.

13 Okay. It's not really a particularly
14 important topic for this --

15 (Simultaneous speakers.)

16 **A I'll say.**

17 BY MS. DELGADO:

18 Q Sorry?

19 **A I agree.**

20 Q Let's move on here.

21 Let's -- let's see here.

22 Kellyanne, are you friends with Jason
23 Miller?

24 **A We're not not friends, but I rarely speak**
25 **with him.**

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1 Q What is --

2 (Simultaneous speakers.)

3 A I see him a couple times -- I think I see
4 him a couple times a year.

5 Pardon?

6 BY MS. DELGADO:

7 Q What does "not not friends" mean? I'm not
8 familiar with that term.

9 A I don't think we have an antistic (sic)
10 relationship, but we don't hang out. We don't work
11 together.

12 Q Do you want to see him in this White House
13 if Mr. Trump wins?

14 MR. FLOOD: Object to --

15 A I haven't thought about that.

16 MR. FLOOD: Object to form. It is...

17 MS. DELGADO: I'm not sure what the
18 objection to form would be there.

19 BY MS. DELGADO:

20 Q If Mr. Trump wins, would you like to see
21 Jason Miller in the White House?

22 A I'm not in charge of President Trump's --
23 I haven't thought about that one way or the other.
24 I'm not in charge of his personnel.

25 Q Sure. I'm not saying you have thought

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1 about it. I'm asking you now, your opinion.

2 Would you like to see --

3 **A I don't have an opinion. I don't have an**
4 **opinion.**

5 Q You have no opinion on whether Jason
6 Miller should be in the White House if Mr. Trump
7 wins?

8 **A I have no opinion. That's up to**
9 **Mr. Trump.**

10 Q But would you --

11 **A President Trump.**

12 Q Would you like to see -- Former President
13 Trump.

14 Would you like to see him in the
15 White House?

16 **A I don't have an opinion.**

17 Q Okay. But you said you would have liked
18 to have seen him in the 2016 through 2020 White
19 House earlier. What changed?

20 **A Did I say that?**

21 MR. FLOOD: Object to form.

22 BY MS. DELGADO:

23 Q I could ask the court reporter to read it
24 back. You said you wish none of this would have
25 happened, that you would have liked to have seen

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1 both of us working in the White House.

2 **A No.**

3 **Q So --**

4 **A What I said was -- no. What I said was, I**
5 **wish that this hadn't happened the way it did. I'm**
6 **grateful that you have a wonderful son, Will. God**
7 **bless him. So that makes me very happy.**

8 **What I said was, I wish that it**
9 **hadn't happened as it did since I wish both of you**
10 **had worked harder the night before the final debate.**
11 **You should've been doing what the rest of us were**
12 **doing, which is working our asses off to get an**
13 **underdog guy to beat the first female President in**
14 **the United States who was on the precipice of that.**

15 **I wanted everybody to be working**
16 **hard. I figured you were. I didn't monitor such**
17 **things. That's what I said --**

18 **(Simultaneous speakers.)**

19 **MS. DELGADO: Can the court reporter read**
20 **back the question she gave about, I wish this**
21 **wouldn't have happened, I wish you were both**
22 **working in the White House?**

23 **THE STENOGRAPHER: It doesn't work exactly**
24 **that way. It would take me quite a while --**

25 **(Simultaneous speakers.)**

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1 THE STENOGRAPHER: -- because if I don't
2 have the very specific words, I can't -- I
3 can't go back and find a general understanding.

4 MS. DELGADO: Sure. Sure. It'll -- it'll
5 be on the transcript.

6 BY MS. DELGADO:

7 Q Okay. So has anything changed, Kellyanne,
8 from your perception of Mr. Miller -- wanting to see
9 Mr. Miller in the White House in 2016 versus now?

10 **A No.**

11 Q And when you say they -- we should have
12 been working -- when you changed your answer to say
13 that you meant we should've been working harder the
14 night before the final debate, what are you
15 referring to?

16 MR. FLOOD: Object to form.

17 (Simultaneous speakers.)

18 **A Yeah.**

19 MS. DELGADO: I'm asking what she was
20 referring to.

21 MR. FLOOD: Yeah, and what I'm saying,
22 Ms. Delgado, is, if you're going to build the
23 words "when you changed your answer" into a
24 question, you're going to get an objection from
25 me. And your response to my objection didn't

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1 address that at all.

2 If you want to avoid this kind of
3 objection, don't characterize my client's prior
4 testimony in the way that you did.

5 BY MS. DELGADO:

6 Q You can answer, Kellyanne.

7 A Yes, I'm referring to the way you were
8 working the night before because, then, I -- I
9 believe I was told or maybe you tweeted it. I don't
10 know how I know this, but that you were together the
11 night before the last debate when the rest of us
12 were with Mr. Trump preparing him for that debate or
13 trying to speak to the press about the debate.
14 Trying to win this election, frankly, and all the
15 things that matters.

16 And I believe that the two of you
17 were out somewhere with a reporter or a cameraman or
18 something, as I vaguely recall from one of the
19 networks. Maybe ABC.

20 And so it -- it started to come out
21 that you were involved, and I guess conceived a
22 baby? Is that what I'm led to believe? I don't
23 know. I don't recall the specifics. But all I do
24 know is I don't remember either of you helping the
25 night before the way you could have.

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1 **So yes, that is my business. We had**
2 **our backs up against the wall. Nobody thought we**
3 **could win. We needed all hands on deck, and that**
4 **was what I was referring to.**

5 Q Jason Miller was my supervisor, so what
6 exactly is it you're referring to that we had been
7 asked to help with that we did not help with --

8 MR. FLOOD: Object to form.

9 BY MS. DELGADO:

10 Q -- the night before? I'm trying to get to
11 what it is -- what help it is we were supposed to
12 provide you're referring to.

13 A **Is it true or not true that you conceived**
14 **a baby that night?**

15 Q It's absolutely not true.

16 A **Okay.**

17 **(Simultaneous speakers.)**

18 A **Did I read that somewhere?**

19 BY MS. DELGADO:

20 Q -- you're hearing.

21 Who did you hear that from,
22 Kellyanne?

23 A **I have -- I have no idea. Isn't your**
24 **child six and a half? I have no idea who I heard**
25 **that from. I don't know.**

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1 Q So you're --

2 A I don't know.

3 Q -- you're sitting here today stating that
4 the rumor mill was that my son was conceived the
5 night before the final debate?

6 MR. FLOOD: Object to form.

7 MS. DELGADO: I'm sorry. What did I get
8 wrong?

9 BY MS. DELGADO:

10 Q Kellyanne, did you not just state, Wasn't
11 your son conceived that night? Maybe I misheard
12 you.

13 A That is what I stated.

14 Q Okay. Where did you hear that?

15 A I have no idea. Could've been anywhere.
16 Could've been in one of your tweets, could've been
17 in one of those ridiculous left-wing rags that you
18 want to pass off as credible, could be from some --
19 I have no idea.

20 Q Okay. So you're basing your
21 qualification -- your description that I was not
22 working the night before the final debate on a rumor
23 you heard that I was, instead, busy conceiving my
24 child.

25 MS. DELGADO: Object to form.

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1 **A** I didn't say that. I didn't say -- nope.
2 I didn't say that. You're putting words in my
3 mouth.

4 BY MS. DELGADO:

5 **Q** I think the testimony will speak for
6 itself. For the record, my --

7 (Simultaneous speakers.)

8 **A** I think this -- I think this all speaks
9 for itself. I agree with that.

10 BY MS. DELGADO:

11 **Q** Okay. You are aware, however, that
12 Mr. Miller took a group of subordinates to a strip
13 club the night before the final debate, correct?

14 **A** Well, that's what I'm referring to. I
15 have no idea what the nature of the venue was. I
16 just know that the -- at least the two of you were
17 there, and there was some reporter or cameraman or
18 producer or someone from one of the networks,
19 possibly ABC. That's all I know.

20 **Q** All right. We'll circle back to that
21 because there was an article about that.

22 **A** But it sounds like you --

23 (Simultaneous speakers.)

24 **A** Respectfully, it -- the fact that there's
25 an article about someone at a strip club doesn't

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1 mean I read it, I promise you. And I think we need
2 to establish for the record factually that you are
3 far more active on social media that I can ever hope
4 to be.

5 You like to tweet. You direct
6 message me on Twitter about this deposition because
7 that's, I guess, where you spend a lot of time. I
8 don't. It took me a while to even see your direct
9 message. I don't think it's an appropriate place
10 to -- to contact a witness.

11 So you and I are not going to see
12 articles about -- we're not going to see articles
13 about a -- I'm no -- I'm no more likely to have seen
14 an article about you and Jason Miller and others at
15 a strip club in Las Vegas any more than I would be
16 at the strip club in Las Vegas the night before the
17 debate.

18 BY MS. DELGADO:

19 Q Okay. Let's put that article up.

20 Let's see here. Just open the link
21 instead.

22 In the meantime, Kellyanne, while I
23 get the article up, how is it that a comms director
24 for a campaign who takes subordinates to a strip
25 club the night before a debate is elevated to comms

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1 director for a White House?

2 MR. BLUMETTI: Objection to form.

3 MS. DELGADO: Well, she just said he
4 took -- he did it.

5 BY MS. DELGADO:

6 Q How is he elevated to White House comms
7 director?

8 A You'd have to ask the person who gave him
9 the job.

10 Q And who was that?

11 A President Trump.

12 Q Okay.

13 A But I guess we can ask the same of the
14 people who went to the strip club with him. Did
15 anybody go against their will? Was it a condition
16 of their employment?

17 Q Do you believe, when a boss has you go to
18 something, do you believe that you have room to say
19 no?

20 A Absolutely. Me? Always.

21 Q Okay.

22 A Of course.

23 Q Have you ever worked underneath Jason
24 Miller?

25 A Nope.

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1 Q Okay. Give me one second. This is a
2 link, not a PDF, so I'm having trouble.

3 Let's see. Okay.

4 Are you able --

5 (Simultaneous speakers.)

6 BY MS. DELGADO:

7 Q It was -- it wasn't a leftist rag from
8 which you got this information. Trump advisers went
9 to strip club with members of the media.

10 MS. DELGADO: I'll mark this exhibit
11 whatever number we're by, Leila. Thank you.

12 (Exhibit 7 was marked for
13 identification)

14 BY MS. DELGADO:

15 Q It's October 22nd, 2016. And you stated
16 earlier that it was just Miller and I; but there's
17 another name here, Deputy Communications Director
18 Jessica Ditto. Correct?

19 A Yeah. I didn't say it was just --

20 (Simultaneous speakers.)

21 MR. FLOOD: Object to -- object --
22 object -- I object to the form of the question.

23 A Yes. You can't put words in my mouth,
24 Ms. Delgado. I didn't say that. I said I knew it
25 was the two of you and some producer, cameraman, or

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1 reporter. And I also said the fact that your child,
2 God bless him, is six and a half or six and whatever
3 means that this was a very long time ago. I'm not
4 policing who you go to strip clubs with.

5 BY MS. DELGADO:

6 Q Okay. Kellyanne --

7 A But what am I looking at?

8 (Simultaneous speakers.)

9 A I'm looking at Page Six. I don't see -- I
10 don't see the article. I only see --

11 BY MS. DELGADO:

12 Q Oh. Hold -- you don't see it?

13 A No. I see Page Six recommended for you,
14 which is telling us what Page Six recommends for
15 you. It doesn't -- I see Kristin Davis --

16 Q I'm scrolling. You don't see the
17 scrolling?

18 (Discussion off the record.)

19 BY MS. DELGADO:

20 Q Okay. Let me ask it this way, then: Do
21 you recall, Kellyanne, that Ms. Jessica Ditto was
22 also present at that outing?

23 A I did not recall that.

24 Q Okay. Then we're going to have to circle
25 back to this exhibit. I'll get it up somehow.

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1 And you did say, Kellyanne,
2 earlier -- I didn't mean to put words in your mouth.

3 You did say -- while it's true you
4 didn't say we were there alone, you did indicate
5 that we were the only two Trump campaign members
6 there. You stated it was Miller, myself, and
7 members of the media. Correct?

8 MR. FLOOD: Object to -- object to form.

9 (Simultaneous speakers.)

10 **A I said, As I recall -- right. No.**

11 BY MS. DELGADO:

12 Q Correct.

13 **A I didn't say that. Please don't put words**
14 **in my mouth. Please.**

15 (Simultaneous speakers.)

16 BY MS. DELGADO:

17 Q No. I'm not trying to.

18 **A Okay. The answer --**

19 (Simultaneous speakers.)

20 **A Well, first of all, Ms. -- Ms. Delgado,**
21 **I'm not going to repeat my answers because you're**
22 **mischaracterizing them. My answer is the same.**

23 **As I recall, you were there;**
24 **Mr. Miller was there; and some reporter,**
25 **photographer, cameraman, producer, someone from a**

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1 network -- possibly ABC, possibly not ABC.

2 This is six and a half years ago,
3 seven -- seven and a half -- excuse me, seven and a
4 half years ago. Let me correct that. Seven and a
5 half years ago.

6 So that doesn't mean I said you were
7 the only two there. I just said --

8 BY MS. DELGADO:

9 Q Oh, okay.

10 A -- I knew that the two of you were
11 there --

12 Q Uh-huh.

13 A -- and some -- doesn't mean that there
14 weren't 10 people there, 40 people there, 2 people
15 there.

16 Q Right. Okay.

17 A I'm telling you what I remember about who
18 was there.

19 Q So you can see -- it's not your
20 understanding that we were there alone, he and I,
21 from the campaign.

22 A No. I have no idea who else was there.

23 Q Okay. Fair enough. That's all -- okay.
24 Just need to clarify what your representation was.

25 Let's see.

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1 Kellyanne, for the Denson deposition,
2 you stated -- in the Denson case deposition, you
3 stated that the Trump campaign had provided you an
4 attorney, correct? Do you recall that?

5 **A Yes.**

6 Q Why wasn't one provided for this case? Do
7 you know?

8 MR. FLOOD: Objection -- wait. Wait,
9 wait, wait, wait, wait, wait.

10 Object to form. I --

11 And, Kellyanne, if you know, you can
12 answer. If it involves -- if the answer in any
13 way involves any discussions with any lawyers,
14 I'm going to ask you to hold off answering.

15 THE WITNESS: Yeah. It's probably a
16 privileged answer.

17 MR. FLOOD: Well, let me explore that so
18 we have a record.

19 The question is: Why didn't the Trump --
20 Ms. Delgado, tell me if I get this wrong. The
21 question is: Why didn't the Trump campaign
22 provide you with a lawyer for this case? Is
23 that the question?

24 MS. DELGADO: In contrast to the
25 earlier -- to the other employment

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1 discrimination.

2 **A I don't -- I don't know -- I don't know,**
3 **but I work with Mr. Flood in the White House. I've**
4 **known him and his reputation for decades, and he has**
5 **represented me in other matters. So...**

6 BY MS. DELGADO:

7 Q Sure. I'm not trying to get --

8 MS. DELGADO: And, Mr. Flood, I'm not
9 trying to get at a -- I just thought, if she
10 had a particular reason that she wanted to
11 share as to what -- what the distinction was.
12 If it's attorney-client privilege, happy to
13 move on.

14 MR. FLOOD: Well, I don't know whether
15 it's attorney-client privilege or not as to
16 other conversations, but she hired me.

17 MS. DELGADO: Okay. Fair enough. Fair
18 enough.

19 THE STENOGRAPHER: AJ, you're still
20 sharing that Page Six.

21 MS. DELGADO: Yeah. I just -- it's fine
22 if you guys -- okay. Let's see. I'm going to
23 do a new share .

24 BY MS. DELGADO:

25 Q Okay, Kellyanne. This is --

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1 MS. DELGADO: Can you guys see that? It's
2 like a screenshot that says it's Page 136 of
3 506.

4 THE STENOGRAPHER: We can. It's very,
5 very large. Basically, we can see a part of a
6 list of names with Delgado highlighted, and
7 that's all that's visible at this point.

8 MS. DELGADO: Correct.

9 BY MS. DELGADO:

10 Q Kellyanne, do you recognize this as --
11 this is -- I'm representing that this is a
12 screenshot of your book, which I purchased when it
13 was published.

14 A **Thank you.**

15 Q It was great.

16 And thank you for mentioning me as
17 one of the individuals, if you see my name there,
18 that you single out as having done good work on the
19 campaign.

20 Is this a correct representation?

21 A **Absolutely, yes.**

22 Q Okay. Now, which of those -- Kellyanne,
23 if you can read over that list, which of those
24 individuals, if any, did not go into the White
25 House, other than Daniel, which you've mentioned

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1 earlier, the travel booker?

2 If you know.

3 **A Forgive me if I don't know about Michael**
4 **Abboud -- oh, Michael Abboud would not have gone.**
5 **Gelbinovich did not go, you did not go -- I'm**
6 **reading in order here. Hold on.**

7 **Scaramucci didn't go -- well, I mean,**
8 **he went later and lasted 11 days. And then, of**
9 **course, Epshteyn went; was gone in two months.**
10 **Brian Lanza did not go.**

11 **Steven Cheung wasn't there long.**
12 **Yeah. I think that's about it. DeWit took a job at**
13 **the -- at NASA.**

14 **Q Okay. So we've spoken about Lanza**
15 **earlier, who was offered a job and offered to go**
16 **into lobbying. And the first you said, sorry, was**
17 **the Michael Abboud, Mike Abboud?**

18 **A Yes.**

19 **Q Do you know if he wanted a White House job**
20 **and wasn't given one or what he did?**

21 **A I don't know -- I don't know. I don't**
22 **know.**

23 **Q Okay. So can you specify any of these**
24 **who -- I know your earlier answer describes some who**
25 **went in for a short period such as Scaramucci and**

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1 Boris Epshteyn.

2 Can you specifically point to someone
3 who want -- that you know asked for a job but did
4 not go in for any period of time?

5 A Oh, I don't know the answer. Adams, I
6 think she was there.

7 Do I know people who wanted the
8 job -- well, that's not the purpose of this list, by
9 the way. I need to --

10 Q Sure.

11 A -- say that. So this is -- this is like a
12 self-selected list of people I wanted to call out in
13 my book --

14 Q Sure.

15 A -- for credit, and so -- anybody else
16 here.

17 Not that I can see in this little
18 excerpt, no. I see Dave Bossie's name to the left
19 in a column, ironically, because it's spilling over;
20 and he obviously, you know, is -- is singled out by
21 himself because he was the deputy campaign manager
22 and he did not get a job in the White House.

23 Q Did not get any job or did not get the job
24 he wanted?

25 A I don't think he -- I'm not sure he was

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1 **offered any job. I don't know.**

2 Q You don't know, okay.

3 MS. DELGADO: Okay. So we'll mark that
4 exhibit whatever we're by. Sorry. I should be
5 keeping track. I'm sorry, Leila.

6 THE STENOGRAPHER: No. It's fine. I can
7 always get you a list.

8 (Exhibit 8 was marked for
9 identification)

10 BY MS. DELGADO:

11 Q Kellyanne, I want to -- you mentioned
12 earlier my -- my penchant for Twitter, which I don't
13 deny. I'm going to throw up on the screen what I'm
14 representing is an accurate copy of our Twitter DM
15 history.

16 **A Okay.**

17 Q Let me put that up.

18 (Exhibit 9 was marked for
19 identification)

20 BY MS. DELGADO:

21 Q And I love that picture that you have.

22 *(Discussion off the record.)*

23 THE STENOGRAPHER: Off the record.

24 *(Recess.)*

25

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1 BY MS. DELGADO:

2 Q So these are our DM.

3 A Okay.

4 Q If anything doesn't look accurate to you
5 or stands out, let me know. And, you know, that
6 last one is the recent one where you replied about
7 not checking Twitter often --

8 A Wait, so the dates -- right. August 24 --
9 oh, yeah. So that's, like, three and a half years
10 later. Okay.

11 Q Yeah, they go back --

12 (Simultaneous speakers.)

13 A Let's see.

14 Merry Christmas. I know him -- hold
15 on, hold on, hold on.

16 (Simultaneous speakers.)

17 A I do -- I do vaguely recall this. I do --
18 I didn't know if it was a direct message or an
19 e-mail but -- or a text, but I -- I seem to not have
20 any texts from you because I checked in advance of
21 this meeting. But -- or deposition, excuse me.

22 But I do recall you direct messaging
23 me and embedding in the message a very -- you know,
24 a snarky, mean description that Jason Miller
25 allegedly made of me and my breasts. So yes, I do

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1 **recall receiving that because I don't receive those**
2 **every day, direct message or otherwise.**

3 BY MS. DELGADO:

4 Q Uh-huh.

5 **A Yes.**

6 Q Were you concerned about the comments that
7 Miller made about women? Not just you. Any -- any
8 that you heard besides the one about yourself?

9 **A I did not hear that. I heard that from**
10 **you. I did not hear that.**

11 **If I had to be concerned about**
12 **comments made by people about other people's**
13 **appearances, including mine, I would be miserable**
14 **and too busy to breathe.**

15 Q I understand. I understand.

16 Okay. So I wanted to point out one
17 in particular, which is -- if you just want -- you
18 know, just for authentication. I'm just putting
19 this into the record. If there's any reason to
20 think that that's not accurate, let me know.

21 But it's one that you wrote on
22 December 26, 2017, so about a year later. And for
23 the record, it says, quote, In my view, we had a
24 positive and productive working relationship during
25 the campaign, you were part of a small, smart,

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1 nimble, tenacious team that helped Trump-Pence win,
2 who were superior candidates. Unquote.

3 So just going to put that into the
4 record if that seems accurate.

5 MS. DELGADO: And we'll mark this --

6 **A Sure.**

7 MS. DELGADO: I think I already marked it.
8 If I didn't, Leila, sorry.

9 THE STENOGRAPHER: Yes, we've marked this
10 one. We've got this one.

11 MS. DELGADO: Zoom is so not
12 user-friendly.

13 BY MS. DELGADO:

14 Q Then -- let's see.

15 Okay. Here's another exhibit. And
16 we should be done fairly soon, Kellyanne. I'm
17 keeping your flight in mind.

18 **A I appreciate it. Thank you.**

19 Q No, I --

20 **A Thank you.**

21 Q -- empathize.

22 Okay. This is another excerpt,
23 Kellyanne, from your book, which is Page 37. If
24 you're able to see it, I have a highlighted portion.

25 **A No, I know exactly that. I -- I can**

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1 **remember the day 20 years ago.**

2 Q Okay.

3 **A Yes.**

4 Q Just want to authenticate. You wrote,
5 quote, about a time that a male colleague or
6 supervisor made a comment of, quote, Well,
7 obviously, soon you will be out of commission, so
8 who will be servicing your project when he was
9 stick -- according to you, staring at your belly and
10 you were pregnant with twins.

11 Is that accurate?

12 **A Yes, it is.**

13 Q And I'm sorry you experienced that, by the
14 way.

15 **A Thank you. I mean, it said a lot about**
16 **him.**

17 Q Okay.

18 MS. DELGADO: So I'm marking that as an
19 exhibit, Leila.

20 (Exhibit 10 was marked for
21 identification)

22 BY MS. DELGADO:

23 Q And then -- let's see.

24 Then there's another exhibit,
25 Kellyanne, also from your book. I'm going to share

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1 the screen again.

2 Which...

3 **A Okay.**

4 Q Okay. And here, you're praising Mr.
5 Trump, and you speak of being denied a set at the
6 big boys' table, quote, and how you have been -- in
7 your life, you've been, quote, grabbed, groped,
8 cornered, propositioned, and punished for being
9 noncompliant, and worse, unquote.

10 **A Uh-huh. All true.**

11 Q And is that, Kellyanne, from your work in
12 D.C., in the political sector with your polling
13 company or...

14 **A Yes.**

15 Q Okay. And sorry you experienced that as
16 well.

17 **A Thank you.**

18 Q So marking that.

19 Okay. And -- let's see.

20 Okay. Here's another one.

21 **A Okay.**

22 Q Sorry.

23 *(Discussion off the record.)*

24 BY MS. DELGADO:

25 Q Okay. This is just an excerpt, Kellyanne,

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1 from the deposition you gave in Ms. Denson's case.

2 **A Uh-huh.**

3 Q Just want to authenticate if this seems
4 correct to you, if this looks correct.

5 MS. DELGADO: And I want to mark this as
6 an exhibit, Leila.

7 (Exhibit 11 was marked for
8 identification)

9 BY MS. DELGADO:

10 Q I'm going to read aloud a portion of a
11 paragraph that begins with "she," and it's -- you're
12 referring to me, Kellyanne, and you write, She has a
13 law degree from Harvard. She -- I believe she's
14 originally from Miami or at least has roots there or
15 lived there at some point and maybe does now. She
16 always struck me as very intelligent, very engaged,
17 and willing to help.

18 And you also write about a note I
19 wrote you. You say here that I wrote you after we
20 won the campaign, et cetera.

21 Does that seem accurate?

22 **A Yes.**

23 Q Okay. Thank you.

24 So we'll mark that.

25 And trying to see if there's anything

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1 else to authenticate. Trying to go through this
2 quickly.

3 Okay. I'm going share -- just --
4 this is also another quick easy one just to
5 authenticate.

6 Kellyanne, did -- is this an accurate
7 tweet? And I remember this. On election night,
8 circa 12:41 a.m., I tweeted, quote, That moment it
9 does hit you and you cry uncontrollably in the
10 middle of 54th Street and call your mom, and three
11 American flags, obviously referring to our --

12 **A They --**

13 **Q -- our win.**

14 And you grabbed my tweet and
15 retweeted it with, quote, You are a warrior, in all
16 caps. Sing it, Sister. Be proud. We love you.

17 Is that correct?

18 **A Yes. I forgot this completely, but all**
19 **true.**

20 **Q And thank you for those words.**

21 (Exhibit 12 was marked for
22 identification)

23 BY MS. DELGADO:

24 **Q We are breezing through this, so I am**
25 **hoping to have you out of here before the three**

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1 hours I said. Just...

2 **A Thank you.**

3 Q No problem.

4 Okay. And then I wanted to show you
5 another e-mail. I'm marking this one as an exhibit
6 as well.

7 (Exhibit 13 was marked for
8 identification)

9 BY MS. DELGADO:

10 Q Here's an e-mail -- for some reason, the
11 screenshot is in reverse chronological order. I'm
12 e-mailing you about Telemundo and whether we can get
13 an interview schedules for Jose Diaz-Balart.

14 It's September 15, 20 --

15 **A Yes.**

16 **(Simultaneous speakers.)**

17 Q -- at 3:51.

18 And I write, P.S., My mom saw a photo
19 of you today, blah, blah. I'm telling all my mom's
20 things, Said you look like Prissy from Three's
21 Company. Sign it warmly, include myself. And you
22 reply, Thanks so much. And then we discuss
23 revisiting the Telemundo issue.

24 Just putting this in as an exhibit.

25 **A Okay.**

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1 Q Does this look accurate to you, Kellyanne?

2 **A Yes.**

3 Q Okay. Thank you.

4 MS. DELGADO: Okay. So X that one out,
5 Leila. And I'm -- sorry.

6 That's the DMs we already did.

7 BY MS. DELGADO:

8 Q Oh, Kellyanne. There -- there is one
9 thing. I don't have it up as an exhibit. I can
10 bring it up.

11 There -- you referred to -- to
12 Miller, Jason Miller in your book as a, quote,
13 marquee name, M-A-R-Q-U-E-E. Why -- why did you
14 describe him like that?

15 **A Well, he's up there with -- I think I also**
16 **mentioned Scaramucci, Bill Stepien. I think these**
17 **are people who have been in Republican campaign**
18 **politics for a long time. The case with Scaramucci,**
19 **he's a little bit different. He has his own**
20 **financial firm or investment firm. SkyBridge,**
21 **something like that.**

22 So -- but I -- I describe them all
23 as -- they had very senior positions on the
24 campaign, and they are known to -- I'd say the way I
25 would describe Jason Miller and Bill Stepien as,

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1 quote, marquee names on TV or in print, slash --
2 especially in the case of Jason, slash, known to
3 down ballot candidates over the years. So governors
4 and senators and members of congress and candidates.

5 So that's what I would say in terms
6 of -- that's what I meant, political marquee names.

7 Q Okay. Even though, from my understanding,
8 Miller had mostly -- and correct me if I'm wrong.
9 Miller had mostly working on losing campaigns. Did
10 not have much of a win record.

11 But -- but you're saying the marquee
12 reference was more about the --

13 A Well-known.

14 Q -- the length of time?

15 A Well-known, yes.

16 Q Gotcha. Okay.

17 Let's see.

18 Think there's just one more exhibit.

19 A Okay.

20 Q Yeah. Okay. Let's see.

21 I'll screenshot it again, make it
22 easier to share.

23 (Exhibit 14 was marked for
24 identification)
25

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1 BY MS. DELGADO:

2 Q Okay. If you're able to see that, let me
3 know. It's an -- it's a Business Insider article
4 from December 22nd, 2016.

5 A Uh-huh.

6 Q And it's -- it's -- it was a remark you
7 made that got a lot of pickup in the press. And
8 you've made a remark that you had more time because,
9 I don't play golf and I don't have of mistress,
10 unquote.

11 Who are you referring to there,
12 Kellyanne?

13 A I first said this in 2012. I guess I
14 wasn't well-known enough then to -- for it to get
15 pickup, so it wasn't new and it wasn't -- it wasn't
16 targeted to anyone individual in 2016.

17 I made the point that everybody -- I
18 was responding on a live television show with Maria
19 Bartiromo, Fox Business. She apparently had just
20 had Ron Williams on, Fox News contributor, who said,
21 I don't -- she said, Why don't you react to big
22 news? Kellyanne Conway, going is to the White
23 House, counselor to the President, you know, first
24 camp, blah, blah, blah. And I had been on Good
25 Morning America that morning, I had been on Fox &

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1 Friends, I think.

2 So I went up to do Maria's show, and
3 I hadn't been looking at other media. And she said
4 on live TV something like, Ron Williams just said --
5 he said he's getting roasted on social media for
6 saying, I don't know how Kellyanne's going to have
7 that big job and those four kids. And I said, Oh,
8 you know, give -- give -- don't pick on Juan. It's
9 okay. Lay off him. I can tell you how I'll do it.
10 And I sort of said something I had said four years
11 earlier the first time.

12 So it wasn't about anybody who plays
13 golf or has a mistress. It was the -- it's a entire
14 class of individuals who, somehow, we all think have
15 all the time they need to do their jobs, even though
16 they've got a wife, a girlfriend, a golf game, a --
17 so it was -- it was really about time management and
18 was -- did get a lot of pickup.

19 It got a little bit of pickup when I
20 first said it to Arianna Huffington, I think in 2012
21 at one of those conventions, but it's pretty
22 comical.

23 Q Okay. So it wasn't referring to -- to
24 Miller or to Reince Priebus?

25 A Absolutely not.

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1 Q Okay.

2 A No. No.

3 Q Okay. Then I also wanted to show you --
4 and let me know if this looks accurate -- this
5 transcript -- and I'll scroll through because,
6 thankfully, it's actually pretty short. And it's a
7 transcript of your -- of the remarks you made
8 January 27, 2017 at a, quote, March for Life --
9 life, pro-life event.

10 And I wanted to point you to a
11 particular portion here, but I want to let you skim
12 through it first. Let me know -- let me know if
13 this looks accurate.

14 A Yes.

15 Q Okay.

16 A I have no reason to believe it's not. I
17 wrote that myself, and I said those words on that
18 day.

19 Q Okay. And you say --

20 MS. DELGADO: I'll mark, this Leila, as
21 another exhibit.

22 (Exhibit 15 was marked for
23 identification)

24 BY MS. DELGADO:

25 Q You say, quote, Our message and our

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1 positive action must also reach those women who face
2 unplanned pregnancies. They should know they are
3 not alone, they are not judged.

4 Did anyone -- did you or anyone you
5 know of reach out to me from the campaign after it
6 was known that I was pregnant by Miller?

7 A I don't know if we ever talked again. I
8 have no idea. I know that you were very active on
9 social media, keeping everybody up to date on
10 everything, and I responded when you direct message
11 me. But -- I mean, I don't -- I would never ever --
12 what is it -- wish you any ill will. I'm -- pray
13 for you and your son, William.

14 But I don't know that we were sort of
15 intimate friends that were going to keep in touch,
16 so -- no, but exactly what I say about unplanned
17 pregnancies, and there's a reason I don't say
18 unwanted, because I don't look at it that way. I
19 look at it as unintended and unplanned. It's a very
20 intentional word for me, and I say things like that
21 even to this moment seven years later.

22 Q Uh-huh. But -- but nonetheless -- when
23 you say you responded on Twitter DM -- I just want
24 to be clear for the exhibit earlier. The Twitter DM
25 we first had after that was a year later.

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1 So my question is, again -- maybe I
2 wasn't clear -- at the time that it emerged that I
3 was pregnant by Miller, which you spoke of earlier
4 learning of in Mar-a-Lago, did you or did anyone
5 else from the campaign that you can think of reach
6 out to me just to see how I was doing, make sure I
7 still had a -- a position, any -- any -- any topic?

8 **A Well, that's different. You're asking**
9 **did -- did people from the campaign reach out to you**
10 **to make sure you had a position in the White House.**

11 Q No. Did -- no. On any --

12 (Simultaneous speakers.)

13 **A I don't know. The answer to that is I**
14 **don't know.**

15 BY MS. DELGADO:

16 Q On any topic, did you or anyone from the
17 campaign reach out to me after --

18 **A I don't recall.**

19 (Simultaneous speakers.)

20 **A I don't know. I may have. I may not**
21 **have. I don't recall.**

22 But I also, when I talk about you're
23 not alone, we're here to help you in a speech at the
24 March for Life in front of a national, if not
25 international audience, I am thinking about women

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1 **generally and not anyone in specific --**

2 **specifically. Excuse me.**

3 BY MS. DELGADO:

4 Q Sure. It's a beautiful sentiment.

5 But -- so you can -- your answer is
6 you don't recall reaching out to me?

7 A I don't recall reaching out to you.

8 Q And you don't recall --

9 (Simultaneous Speakers.)

10 A I may have. I may not have. I don't
11 know. I don't seem to have your phone number. I
12 looked in your phone.

13 Q Or by e-mail?

14 A I don't know. If I did, it might have
15 been the polling company e-mail address because I --
16 it might have been the White House address for all I
17 know because that company got sold in the fall of
18 2017, so it still existed.

19 If I looked at that as a personal
20 overture, it would be on that e-mail. If it was
21 somehow an official act, it would be in my White
22 House e-mail, which I doubt -- highly doubt. I
23 tried not to use that e-mail very often.

24 So I don't know.

25 Q Okay. Regarding obtaining -- re- --

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1 regarding one's livelihood after working on the
2 Trump campaign, do you agree that it would be
3 particularly difficult for someone who did the kind
4 of work I did in comms as far as going on TV and
5 advocating for the President to be able to obtain
6 employment versus if I had not advocated for Trump
7 publicly? And let me know if that's unclear.

8 **A I think you're asking me do I think it**
9 **would be --**

10 **(Simultaneous speakers.)**

11 **A -- would it be difficult or not difficult**
12 **to get a job after he won?**

13 BY MS. DELGADO:

14 Q No. After -- in the private sector. Not
15 in politics.

16 In the private sector, do you agree
17 with me that it's difficult for someone who worked
18 on the campaign in the role of going on TV and
19 advocating for the President versus someone who
20 working in an operational -- operational role and
21 not --

22 **A I see.**

23 Q -- publicly --

24 **(Simultaneous Speakers.)**

25

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1 BY MS. DELGADO:

2 Q And I hope that --

3 (Simultaneous speakers.)

4 A I see.

5 BY MS. DELGADO:

6 Q -- unclear, but I think you know what I'm
7 saying, versus if I did accounting at the Trump
8 campaign. Or --

9 A Sure. No.

10 (Simultaneous speakers.)

11 A I understand what you're saying. I got
12 the question.

13 I would say, after he got elected,
14 the opposite is true. I think that there were many
15 opportunities for the very relatively small group of
16 people who were on the 2016 campaign. For my -- in
17 my own firm, I could speak to Kellyanne's
18 experience. People were throwing money at me. I
19 was offered eight figures, all told -- including
20 seven figures for TV. And I went into the White
21 House instead. Don't regret that.

22 But that was just a fact. I couldn't
23 keep up with all the offers, and I know other people
24 were in similar situations. I think, right after he
25 won, AJ, would have been the time -- was -- was the

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1 time to say, Hey, I'm one of the only people who was
2 on TV for him. You're very good on TV. I've always
3 said that. Very smart.

4 Q Thank you.

5 A Very strategic. So yes.

6 Obviously, very pretty. Harvard law
7 degree. Speaks Spanish. I think that all matters,
8 and I hope not offending anybody saying that.

9 Anyway --

10 (Simultaneous Speakers.)

11 A It's all a compliment.

12 So I think -- I think that that --
13 yes. I think that there -- there was a market for
14 that. I don't know about now. But I think at
15 that -- in the moment, there was a market for that.

16 And, you know, that's all I'll say.

17 BY MS. DELGADO:

18 Q And sorry, Kellyanne. I should've been
19 clearer. I don't mean in the private sector in the
20 political arena.

21 Just returning to legal practice or
22 anything nonpolitical, do you think that would be in
23 any way hindered by having publicly put my face out
24 there with Trump?

25 A Oh, I'm sure there were people. Trump --

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1 listen, yes, of course, there are going to be some
2 people. Do I think it's epidemic? No. Do I think
3 Trump derangement syndrome is real and it nests
4 itself in people's brains and they become obsessed
5 with someone they never even met who improved the --
6 their economic lives? Yes, that is very real.

7 But I can't imagine that's everywhere
8 and everything. I think there are always going to
9 be people who say, I don't want you and I want you
10 for whatever reasons. I mean, that's just life.
11 And I -- yeah.

12 I -- I know people who were looking
13 for jobs, got them, and -- in the private sector, in
14 the legal profession. So -- and there were some
15 firms that were seen as more Trump aligned, I think,
16 like, a Jones Day, had done a lot of work for him,
17 so -- for his campaign. His -- one of the partners
18 there became his first White House counsel.

19 Q Right.

20 And do you agree that my not being
21 given a White House job would signal to the Trump
22 supporting factions that you mentioned -- for
23 instance, TV jobs that you mentioned or even legal
24 jobs at a firm like Jones Day -- wouldn't that have
25 affected my ability to market myself?

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1 **A** Perhaps. But I personally never heard
2 anybody say, We have to keep AJ out, she can't get a
3 job, we're going to make sure she never works in
4 this town again. I heard nothing like that.

5 So I don't know -- maybe people
6 presumed, as they often do with us. Maybe they just
7 presumed that you were going to focus on your
8 health, and then your son. Maybe they presumed that
9 you are an unmarried mother who needs to support
10 herself and her son. I don't know what people
11 thought.

12 I do know, generally speaking,
13 outside of you or me or any -- anyone else, that's
14 the kind of conversation and consideration that goes
15 on every single day between a prospective employer
16 and a prospective employee.

17 **Q** Two final exhibits, and then I think we're
18 done.

19 **A** Okay.

20 **Q** Or I can even just ask it without them.
21 Unless you want to see the exhibit.

22 There was --

23 **A** No.

24 **Q** And I don't want to put the exhibit up
25 because it's -- the headline is about -- reveals

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1 marriage status with George Conway, which has
2 nothing to do with this deposition. Certainly don't
3 want to bring up any uncomfortable topic.

4 The only -- the reason I find it
5 relevant is, within that article, you speak of a
6 boys club in the White House between Bannon,
7 Priebus, and Kushner. Do you recall that?

8 **A Yes.**

9 Q Okay. That way, I don't have to -- we'll
10 just -- I'll mark -- I'll just link to it, and then
11 I'll mark it as an exhibit. But no need to throw
12 the screenshot up.

13 MS. DELGADO: I'm going to mark as an
14 exhibit, Leila, this -- I'm going to mark as an
15 exhibit, and I'll e-mail it to you later, a New
16 York Post, May 26, 2022.

17 (Exhibit 16 was marked for
18 identification)

19 **A May 26, 2022.**

20 BY MS. DELGADO:

21 Q Okay. And then you also spoke of a boys
22 club in a Yahoo article, Trump allies blame White
23 House boys club for mishandling a Porter scandal.

24 Does that ring a bell that you would
25 have referenced a boys club?

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1 A That does not, but I -- I very well may
2 have. I -- did I reference it, or did someone else?

3 Q Was there a boys club --

4 A I'm sorry.

5 (Simultaneous speakers.)

6 A I'm sorry. It was an article where?

7 BY MS. DELGADO:

8 Q In Yahoo. Yahoo.

9 A Oh. I don't know. I -- I can't imagine I
10 said that. It sounds like the FBI let them in.

11 Q But was -- was there a boys club in the
12 White House, which you reference --

13 A Oh, of course. Of course. And I -- but
14 I -- but let me tell you how I explain, and I
15 describe the three that you just mentioned. In the
16 very early pages of my book, Here's the Deal, from
17 May -- as you say, May 2022, I describe how they
18 didn't even, you know, particularly know or like
19 each other, but they formed this threesome. And
20 they were, you know -- it fell apart.

21 I mean, Reince got fired, then Bannon
22 got fired. It fell apart. But they -- I always
23 looked at it as, you know, a combination of ambition
24 and security and focus on trying to get a government
25 formed.

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1 But -- I mean, to me, there -- it's
2 not even a serious thing. It's almost laughable. I
3 don't care about it. But it was real, and it was
4 tenuous. It fell apart.

5 Q And would you say all three of those
6 individuals you mentioned -- and I believe you
7 already answered this. Sorry if I'm repeating
8 myself, but I don't think I asked it as to Steve in
9 particular.

10 You mentioned Reince had hiring
11 authority, and Jared. What about Steve?

12 A Yes. Bannon absolutely had hiring
13 authority, making recommendations for different
14 people to come into the White House, cabinet
15 positions; sat in some of these meetings even when
16 Trump didn't want him to, you know, some of these
17 interviews. And -- yeah, for sure.

18 Q Okay. Let me just glance through my notes
19 here, make sure I didn't miss anything else I want
20 to ask you about.

21 Do you know who made the call for
22 Miller to not come into the White House after he was
23 announced?

24 A I don't know how that all happened. It
25 looks like -- it sounds like it was around

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1 Christmastime, so I wasn't involved at all. And
2 then, the next I knew, it was, you know, he can't
3 come in or he's not coming in or he withdrew or...

4 That's what I knew. So all of a
5 sudden, we -- we waited seven weeks to announce a
6 comms director; and then had one for a couple of
7 days, it sounds like; and then didn't have one
8 again. So I don't know.

9 *(Discussion off the record.)*

10 MS. DELGADO: I think -- yeah. Kellyanne,
11 I think that's it. I don't -- I know you have
12 your flight to catch, but I don't want to sit
13 here reading over my notes --

14 THE WITNESS: It's okay.

15 MS. DELGADO: -- extending this.

16 One more page.

17 THE STENOGRAPHER: AJ, did you want to
18 mark that Yahoo article?

19 MS. DELGADO: No. I asked her about it
20 orally, so it's okay. I'll just send you the
21 other one, the New York Post one that I quoted
22 the headline from.

23 No, I think that's it, Kellyanne.

24 THE WITNESS: Okay. Very good.

25 *(Simultaneous speakers.)*

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1 THE WITNESS: Wish you well. Enjoy your
2 son. Thank you very much.

3 *(The deposition was concluded at*
4 *1:05 p.m.)*

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*May 2, 2024 in re Delgado v Trump for President -
Deposition of Kellyanne Conway*

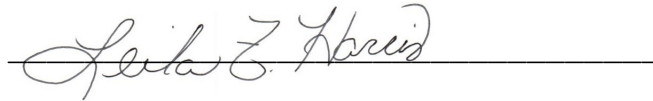
CERTIFICATE OF OATH

STATE OF FLORIDA)

COUNTY OF WALTON)

I, the undersigned authority, certify
that KELLYANNE CONWAY remotely appeared before me
and was duly sworn.

WITNESS my hand and official seal
this 2nd of May, 2024.



Leila Z. Harris, Stenographic Court Reporter

Notary Public - State of Florida

Commission No: HH 144004

My Commission Expires: September 13, 2025

*May 2, 2024 in re Delgado v Trump for President -
Deposition of Kellyanne Conway*

1 STATE OF FLORIDA)

2 COUNTY OF WALTON)

3 I, Leila Z. Harris, LCR (Tennessee), Court
4 Reporter, certify that I was authorized to and did
5 stenographically report the foregoing deposition;
6 and that the transcript is a true record of the
7 testimony given by the witness; Per Federal Civil
8 Procedure Rule 30(e) deponent witness did not
9 request to read and sign transcript.

10 I further certify that I am not a
11 relative, employee, attorney, or counsel of any of
12 the parties, nor am I a relative or employee of any
13 of the parties' attorney or counsel connected with
14 the action, nor am I financially interested in this
15 action.

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18 _____
19 Leila Z. Harris, LCR, FPR
20 Stenographic Court Reporter
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BY MS. DELGADO: [130] 5/17 11/1 14/6 14/21 17/7 24/20 32/22 34/9 35/18 37/6 42/22 43/22 44/13 45/8 52/17 53/1 55/6 55/16 57/13 58/17 60/13 62/1 62/12 62/25 67/16 69/1 74/14 78/6 78/25 80/21 81/14 81/23 84/16 85/17 86/3 88/12 88/21 89/3 89/22 90/7 91/24 92/9 93/1 94/13 96/19 99/10 100/9 100/13 101/4 101/10 102/11 104/7 104/13 105/18 108/6 109/8 110/4 112/1 112/4 112/8 114/8 114/24 116/4 116/9 116/22 117/2 117/18 118/1 119/2 119/9 119/18 119/24 120/17 121/11 122/20 123/16 123/22 124/9 124/19 125/1 125/5 125/15 125/24 126/24 127/7 127/17 128/6 128/19 129/22 131/6 132/5 133/9 133/19 134/9 135/4 135/10 136/18 137/5 138/6 138/14 139/5 139/11 139/19 140/11 140/16 141/8 143/6 143/24 144/9 147/10 147/20 147/25 149/3 150/13 151/22 152/24 153/9 154/23 155/9 156/7 157/25 160/24 162/15 163/3 164/13 164/25 165/5 166/17 169/20 170/7 MR. BLUMETTI: [9] 10/25 87/25 116/21 117/1 117/7 117/24 118/9 119/21 137/2 MR. 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{DEFENDANT}

{WITNESSNAME}
{DATE}

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